

1
IN THE UNITED STATES BANKRUPTCY COURT
2
FOR THE SOUTHERN DISTRICT OF TEXAS
3
HOUSTON DIVISION4
IN RE:)
5
HOUSTON REAL ESTATE PROPERTIES) CASE NO: 22-32998
LLC,) CHAPTER 7
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Debtor.)
_____7
JOHN QUINLAN)
and)
8
OMAR KHAWAJA)
and)
9
OSAMA ABDULLATIF,)
10
Plaintiffs,)
11
vs.) ADVERSARY NO. 23-3141
12
JETALL COMPANIES, INC.)
and)
13
ARABELLA PH 3201 LLC)
and)
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9201 MEMORIAL DR. LLC)
and)
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2727 KIRBY 26L LLC)
and)
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DALIO HOLDINGS I, LLC)
and)
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DALIO HOLDINGS II, LLC)
and)
18
HOUSTON REAL ESTATE PROPERTIES)
LLC)
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and)
SHAHNAZ CHOUDHRI)
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and)
ALI CHOUDHRI)
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and)
SHEPHERD-HULDY DEVELOPMENT I,)
LLC)
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and)
SHEPHERD-HULDY DEVELOPMENT II,)
LLC)
23
and)
GALLERIA LOOP NOTE HOLDER LLC)
24
and)
25
and)

		Page 2	Page 4
1	A. KELLY WILLIAMS) and) 2 MOUNTAIN BUSINESS CENTER, LLC) and) 3 RANDY W. WILLIAMS CH7 TRUSTEE) and) 4 OTISCO RDX LLC) and) 5 MCITEE, LLC) and) 6 JETALL/CROIX PROPERTIES LP) and) 7 JETALL/CROIX GP, LLC,) and) 8 Defendants.) 9		
10	ORAL VIDEOTAPED DEPOSITION OF 11 SHAHNAZ CHOUHDRI 12 NOVEMBER 25, 2024		PAGE
13	14 ORAL VIDEOTAPED DEPOSITION OF SHAHNAZ 15 CHOUHDRI, produced as a witness at the instance of the 16 Plaintiffs, and duly sworn, was taken in the 17 above-styled and numbered cause on November 25, 2024, 18 from 11:00 a.m. to 3:36 p.m., Nilda Codina, Notary in 19 and for the State of Texas, recorded by machine 20 shorthand, from Shackelford, McKinley & Norton, LLP, 21 located at 717 Texas Avenue, 27th Floor, Houston, 22 Texas, 77002, pursuant to the Federal Rules of Civil 23 Procedure, and the provisions stated on the record or 24 attached hereto. 25		
1	A-P-P-E-A-R-A-N-C-E-S 2 FOR THE PLAINTIFF: 3 4 Mr. Michael Ballases, Esq. 5 HOOVER SLOVACEK, LLP 5051 Westheimer Road 5 Suite 1200 5 Houston, TX 77056 6 Phone (713)977-8686 6 Fax (713)977-5395 7 ballases@hooverslovacek.com 8 9 FOR THE DEFENDANT: 10 11 Ms. Lori Hood, Esq. 11 SHACKELFORD 11 717 Texas Avenue 27th Floor 12 Houston, TX 77002 12 Phone (832)669-6081 13 lhood@shackelford.law 14 15 ALSO PRESENT: Pamela Longoria, Videographer; Beth 16 Mendez, Ali Choudhri 17 18 19 20 21 22 23 24 25	Page 3	Page 5
1	P-R-O-C-E-E-D-I-N-G-S 2 THE VIDEOGRAPHER: We are now on the 3 record at 11:25 a.m. Counsel, will you please state 4 your appearances for the record. 5 MR. BALLASES: Michael Ballases for 6 the plaintiffs Omar Khawaja, Osama Abdullatif and John 7 Quinlan. 8 MS. HOOD: And Lori Hood for 9 Mrs. Choudhri. 10 MR. CHOUHDRI: And Ali Choudhri. 11 MS. HOOD: And who is this? 12 MS. MENDEZ: Beth Mendez with Osama 13 Abdullatif. 14 MR. CHOUHDRI: You're with Osama 15 Abdullatif? 16 MS. HOOD: Wait, wait, wait. 17 MR. BALLASES: Yeah, Beth Mendez, she 18 works with Osama. 19 MS. HOOD: She works for him, but does 20 -- he's a party in his individual capacity. So is she 21 his left arm, right arm? 22 MR. BALLASES: Right. She's his right 23 arm. 24 MS. HOOD: Okay. And so can I depose 25 her later?		

<p style="text-align: right;">Page 6</p> <p>1 MR. BALLASES: If we -- if she's put 2 on a list of people who have relevant knowledge of the 3 case, maybe. If not, no --</p> <p>4 MS. HOOD: How do you spell -- how do 5 you spell your last name?</p> <p>6 MS. MENDEZ: M-E-N-D-E-Z.</p> <p>7 MS. HOOD: And what do you do for 8 Mr. Abdullatif?</p> <p>9 MR. BALLASES: All right. You're not 10 answering anymore questions.</p> <p>11 MS. HOOD: Well, I object to her being 12 here. She's not a party, she's not a party rep. An 13 individual can't have a party rep, as you know, so I'm 14 going to object to her being here.</p> <p>15 MR. BALLASES: Okay.</p> <p>16 MS. HOOD: I look forward to deposing 17 her.</p> <p>18 MR. BALLASES: Okay.</p> <p>19 MR. CHAUDHRI: So, Mr. Ballases, as 20 you know, she showed up in front of Judge Robinson, and 21 Judge Robinson kicked her out of the hearing because 22 she's not a party. So I'm objecting to her being here. 23 She should not be here. She's not a party 24 representative. There -- Osama Abdullatif is an 25 individual. He's not here. She can't be here. So I'm</p>	<p style="text-align: right;">Page 8</p> <p>1 MR. BALLASES: Can -- can you stop? 2 Can you stop?</p> <p>3 MR. CHAUDHRI: You just said -- so 4 Ms. -- Ms. Mendez, who are you here on behalf of?</p> <p>5 MR. BALLASES: You don't have to 6 answer any questions.</p> <p>7 Okay.</p> <p>8 MR. CHAUDHRI: You can't just have 9 people in a deposition, Mr. Ballases, --</p> <p>10 THE REPORTER: I have to swear her in.</p> <p>11 MR. BALLASES: Okay. Swear her in.</p> <p>12 MR. CHAUDHRI: You can't just have 13 people in a deposition who crash a deposition. It 14 doesn't work that way.</p> <p>15 MR. BALLASES: Is that what law school 16 taught you?</p> <p>17 MS. HOOD: Okay.</p> <p>18 MR. CHAUDHRI: Please don't be smart.</p> <p>19 MS. HOOD: He's right about the rules 20 and you know that and so, yeah, we'll complain to the 21 Judge and --</p> <p>22 MR. CHAUDHRI: Whether you're a lawyer 23 or you're not, you have to follow the rules.</p> <p>24 MR. BALLASES: Right. You can file 25 whatever objection you want.</p>
<p style="text-align: right;">Page 7</p> <p>1 objecting to her being here.</p> <p>2 So to move forward with this 3 deposition, I would ask that she not be part -- a party 4 to this deposition since she's not a party.</p> <p>5 MR. BALLASES: Okay. Well, she's 6 assisting me, so I appreciate your objection --</p> <p>7 MR. CHAUDHRI: Does she -- does she 8 work for you --</p> <p>9 MR. BALLASES: -- it's noted on the 10 record. It's noted on the record and you can do it.</p> <p>11 MR. CHAUDHRI: -- does she work for 12 you -- is she your paralegal?</p> <p>13 MR. BALLASES: Okay.</p> <p>14 MR. CHAUDHRI: Mr. Ballases, --</p> <p>15 MR. BALLASES: This is not my 16 deposition. Can we just get this over with? Okay. 17 You made your objection. You can file whatever you'd 18 like with the Court.</p> <p>19 MR. CHAUDHRI: Mr. Ballases, what 20 grounds is she here? She's -- she's a paralegal for 21 Hoover Slovacek?</p> <p>22 MR. BALLASES: No. That's not what I 23 said. She's assisting me today.</p> <p>24 MR. CHAUDHRI: Is she -- is she -- is 25 she your legal assistant for Hoover Slovacek?</p>	<p style="text-align: right;">Page 9</p> <p>1 MS. HOOD: And -- and --</p> <p>2 MR. CHAUDHRI: Let's -- let's take a 3 break and call the Judge. No, I want --</p> <p>4 MS. HOOD: No, no, no. I want to get 5 this over with. I want to get this over with as does 6 my client.</p> <p>7 MR. CHAUDHRI: So just so I'm clear, 8 Mr. Ballases, you're refusing to exclude Beth Mendez? 9 You're going to -- you're insisting she stay in the 10 room and you're -- you're objecting to her leaving. 11 You're refusing to have her leave this room; is that 12 correct?</p> <p>13 MR. BALLASES: All right. You've 14 stated your objection to the record. She's assisting 15 me today in the deposition. If you feel like you need 16 to file something with court, then please do so.</p> <p>17 MR. CHAUDHRI: Is she a legal 18 assistant to Hoover Slovacek?</p> <p>19 MR. BALLASES: This isn't my 20 deposition, Mr. Choudhri.</p> <p>21 MR. CHAUDHRI: What right does she 22 have to be here --</p> <p>23 MS. HOOD: It is, actually.</p> <p>24 MR. CHAUDHRI: -- what right does she 25 have to be here?</p>

<p style="text-align: right;">Page 10</p> <p>1 MR. BALLASES: There's a time -- 2 because you didn't go to law school, you don't know how 3 this works. There's a time and place to argue this. 4 You stated your objection on the record, and I 5 appreciate that. We can take it up later with the 6 Judge. Now is not the time to argue it. There's no 7 Judge here.</p> <p>8 MR. CHOUDHRI: Mr. Ballases, well -- 9 well, then I want to state right now -- Ms. Mendez -- 10 Ms. Mendez, you're refusing to leave, right; is that 11 correct?</p> <p>12 MR. BALLASES: She's helping me so, 13 no, I want her here.</p> <p>14 MR. CHOUDHRI: You want her here?</p> <p>15 MR. BALLASES: Yes.</p> <p>16 MR. CHOUDHRI: And she's not a 17 paralegal for you. She's not your legal assistant. 18 She does not work for Hoover Slovacek. Just say it on 19 the record.</p> <p>20 MR. BALLASES: Do you want Ms. -- do 21 you want Ms. Choudhri to finish her deposition or not?</p> <p>22 MR. CHOUDHRI: Say it on the record. 23 Is she a legal assistant for Hoover Slovacek?</p> <p>24 MR. BALLASES: She's assisting me 25 today.</p>	<p style="text-align: right;">Page 12</p> <p>1 is clear, in this room, I'd like the court reporter 2 just to make sure we take an account of who's in this 3 room: Omar Khawaja, the party; John Quinlan, the 4 party; Osama Abdullatif, the party are not present. 5 The only person who's here present is 6 Michael Ballases, the attorney for them and Beth 7 Mendez, who is an assistant of Osama Abdullatif, who is 8 not present. I just want the record to reflect 9 clearly.</p> <p>10 MR. BALLASES: Good job.</p> <p>11 MR. CHOUDHRI: Is that -- is that 12 clear? Is the record clear, Mr. Ballases?</p> <p>13 MR. BALLASES: The record's clear, 14 good job.</p> <p>15 MR. CHOUDHRI: No, it's not about 16 being good job or not. I just want to make sure. Is 17 there anybody else in this room that I failed to 18 mention besides the deponent, Ms. Hood, the court 19 reporter and the videographer?</p> <p>20 MS. HOOD: You've got it covered.</p> <p>21 MR. BALLASES: I mean, unless 22 someone's hiding in the corner, I think you've 23 identified everybody --</p> <p>24 MS. HOOD: Okay. I think we have it 25 covered. I also would like to say that my client's</p>
<p style="text-align: right;">Page 11</p> <p>1 THE WITNESS: No. He is right. I 2 agree with him.</p> <p>3 MR. BALLASES: Okay.</p> <p>4 MR. CHOUDHRI: No, no, I'm not -- it's 5 fine.</p> <p>6 Mr. Ballases, you can't have 7 Ms. Mendez sitting here. She is a representative of 8 Osama Abdullatif. There is no LLC, Osama Abdullatif. 9 Okay. Who are the parties in this case --</p> <p>10 MR. BALLASES: Thank you for 11 stating -- thank you for stating your objection on the 12 record.</p> <p>13 MR. CHOUDHRI: Who are the parties 14 you're representing?</p> <p>15 MR. BALLASES: Can you swear the 16 witness in, please?</p> <p>17 MS. HOOD: Okay. Whoa, whoa, whoa.</p> <p>18 MR. CHOUDHRI: Wait.</p> <p>19 MS. HOOD: She doesn't work for him. 20 Okay. It's been made clear. She works for Osama. 21 She's sitting here because apparently he's too busy to 22 actually come to a deposition, and I look forward to 23 deposing her and she's got no privilege. Okay. So 24 there we go.</p> <p>25 MR. CHOUDHRI: And just so the record</p>	<p style="text-align: right;">Page 13</p> <p>1 been here since 11:00 o'clock. It's now 11:30, so 2 let's get on with it.</p> <p>3 MR. BALLASES: Agree.</p> <p>4 MS. HOOD: And your people were late, 5 not us, so.</p> <p>6 MR. BALLASES: I understand because 7 we're accommodating you to have your deposition here 8 despite the fact that the Court ordered it at the 9 courthouse.</p> <p>10 MS. HOOD: Oh, always play the victim. 11 Okay. Keep going.</p> <p>12 MR. CHOUDHRI: The deposition was 13 supposed to --</p> <p>14 MR. BALLASES: Can you swear her in.</p> <p>15 MR. CHOUDHRI: -- start at 10:00 a.m. 16 You wanted to start at 11:00 a.m., and you showed up 30 17 minutes late to this deposition.</p> <p>18 MR. BALLASES: Can you please swear 19 her in.</p> <p>20 SHAHNAZ CHOUDHRI, 21 Having been first duly sworn, was examined and 22 testified as follows:</p> <p>23 DIRECT EXAMINATION</p> <p>24 BY MR. BALLASES:</p> <p>25 Q. (BY MR. BALLASES:) Hi, Ms. Choudhri, how are</p>

<p>1 you today?</p> <p>2 A. Yes, I'm fine.</p> <p>3 Q. Good. Are you looking forward to</p> <p>4 Thanksgiving?</p> <p>5 A. Yes.</p> <p>6 Q. Me too.</p> <p>7 A. But I was ready for two weeks. Since last</p> <p>8 depo, after that, I was really sick.</p> <p>9 Q. Well, I hope you feel better now. Do you</p> <p>10 feel better today?</p> <p>11 A. Yeah. And I have move -- remove from the</p> <p>12 house. It was terrible.</p> <p>13 Q. Okay. Well, I'm glad you feel better.</p> <p>14 So we're here for the continuation of your</p> <p>15 deposition. We've gone through a lot of this stuff, so</p> <p>16 that's good. That should make this go faster. Do you</p> <p>17 recall all the rules and stuff we talked about the last</p> <p>18 time, or would you like me to go over them again?</p> <p>19 A. I don't know. Whatever you feel. You are</p> <p>20 attorney, you know better. I can do as less than</p> <p>21 anyone.</p> <p>22 Q. Sure.</p> <p>23 A. I need from the point. I don't want to go</p> <p>24 for long.</p> <p>25 Q. Yeah, sure. So I understand. So then I'll</p>	<p>Page 14</p> <p>1 document titled "Notice of Federal Tax Lien" and it</p> <p>2 looks like it was recorded in March of 2018; do you see</p> <p>3 that?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And this document says that there is a</p> <p>6 federal tax lien against yourself, Shahnaz Choudhri; is</p> <p>7 that right?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And it lists amount owed as</p> <p>10 \$7,442,907.78; do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Can you tell me, as you sit here</p> <p>13 today, what -- from where the income that generated</p> <p>14 this liability came from?</p> <p>15 A. But I -- I already cleared this one. There's</p> <p>16 no any problem on this one.</p> <p>17 Q. You're 100 percent right and I've got the</p> <p>18 release, and we're going to go over that, but I have</p> <p>19 some questions before we get to that. So you're right</p> <p>20 on that, but my question's a little bit different.</p> <p>21 My question is, the government, the federal</p> <p>22 government, said you had a seven million four hundred</p> <p>23 some-odd thousand, or some-odd million-dollar tax</p> <p>24 liability.</p> <p>25 And my question is, where did the -- did you</p>
<p>Page 15</p> <p>1 do a refresher real quick. So to make this progress</p> <p>2 smoother, I'm going to be asking you questions.</p> <p>3 Sometimes you'll anticipate my question, and you will</p> <p>4 know what my question is. If you could wait until I</p> <p>5 finish my whole question before you answer it, that</p> <p>6 would be helpful. I will try to give you the same</p> <p>7 courtesy when you're answering a question. I will try</p> <p>8 not to ask my next question until you're done; is that</p> <p>9 fair?</p> <p>10 A. It's fair.</p> <p>11 Q. Okay. And you're doing great so far, but we</p> <p>12 want an answer with yeses, noes, or explanations if you</p> <p>13 need to explain something. What we don't want an</p> <p>14 answer with is nods or shakes of the heads or "uh-huhs"</p> <p>15 or "huh-uhs" because those are hard for the court</p> <p>16 reporter to write down.</p> <p>17 A. Yes, I agree.</p> <p>18 Q. Okay. Okay. Let's jump in. If you can turn</p> <p>19 to Exhibit 2 in this notebook.</p> <p>20 So Exhibits 1 through 29 are in front of you</p> <p>21 and they are from the first deposition. They've been</p> <p>22 placed in a nice notebook for you.</p> <p>23 Exhibit 2 is right there.</p> <p>24 A. I'm sorry.</p> <p>25 Q. That's okay. Okay. So Exhibit 2 is -- is a</p>	<p>Page 17</p> <p>1 derive the income that generated this tax liability?</p> <p>2 A. I don't know.</p> <p>3 Q. Okay. Because if I recall from your last</p> <p>4 deposition, you told me that after the first couple of</p> <p>5 years of working with your husband around 2000, you</p> <p>6 didn't do anymore work after that?</p> <p>7 A. Yes.</p> <p>8 Q. That's correct?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. So in the years 2007, 2008, 2009,</p> <p>11 2010, 2011, you were -- you were not working at those</p> <p>12 times, correct?</p> <p>13 A. I don't know.</p> <p>14 Q. Okay. But you remember that you only worked</p> <p>15 with your husband for two to three years earlier --</p> <p>16 A. I don't remember.</p> <p>17 Q. Okay. If you can let me finish my</p> <p>18 question --</p> <p>19 A. Because it was a long time, I don't remember.</p> <p>20 Q. Yeah, I understand that. So if you can let</p> <p>21 me finish my question. So the reason being is, when</p> <p>22 she types down everything, it will say half a question</p> <p>23 and then an answer and then half --</p> <p>24 A. Okay. Okay.</p> <p>25 Q. Okay. So wait until I finish, please.</p>

<p style="text-align: right;">Page 18</p> <p>1 Okay. So if you turn to Exhibit 3 in the 2 notebook, the next one. Tab three, there you go. 3 Okay. So this is the release that you made reference 4 to. Exhibit 3 to your deposition is titled 5 "Certificate of Release of Federal Tax Lien"; do you 6 see that?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And it looks like it was recorded in 9 October of 2020?</p> <p>10 A. Okay.</p> <p>11 Q. Okay. And this releases your tax liability 12 referenced in Exhibit 2?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Do you -- do you recall who paid to 15 get -- who paid the IRS to get this lien released?</p> <p>16 A. I don't know.</p> <p>17 Q. Okay. If you turn to Exhibit 4, there you 18 go. If you turn to Exhibit 4 of your deposition, it is 19 a check written to the United States Treasury in the 20 amount of \$204,168; do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And that check was written by Galleria 23 Loop Note Holder, LLC?</p> <p>24 A. I don't remember.</p> <p>25 Q. Right. But if you look at the top right of</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Okay. Could you turn to Exhibit 5 in your 2 deposition, please.</p> <p>3 Okay. So Exhibit 5 to your deposition is a 4 document titled "Agency Agreement"; do you see that?</p> <p>5 A. Uh-huh.</p> <p>6 Q. Okay. And this agency agreement is between, 7 if you look in that very first paragraph at the top, it 8 says "This agency agreement is effective as of the 18th 9 of December 2022 by and between Shahnaz Choudhri, 10 principal and Drew G. Dennet"; do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Right at the top. And if you turn to the 13 second to last page which is Bates labeled BRIDGECO 76. 14 And I can help you with that. There you go.</p> <p>15 Okay. Is that your signature on -- on this 16 page, BRIDGECO 76?</p> <p>17 A. I don't remember.</p> <p>18 Q. You don't remember -- so your signature 19 appears on that page. Do you know if that's your 20 signature?</p> <p>21 A. Yes, I know. But I don't remember it.</p> <p>22 Q. Right. So if I understand what you're 23 saying, you're telling me that that is your signature, 24 but you don't remember signing it?</p> <p>25 A. No. Because now because of my health, I'm</p>
<p style="text-align: right;">Page 19</p> <p>1 the check, you can see the check, it says "Galleria 2 Loop Note Holder, LLC"; do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And you can see it references your 5 name in the bottom left-hand corner of the check; do 6 you see that?</p> <p>7 A. Uh-huh.</p> <p>8 Q. Okay. Do -- was this -- do you have a 9 recollection of whether this payment that's reflected 10 in Exhibit 4 was the payment that was made to obtain a 11 release of your tax lien?</p> <p>12 A. I don't know.</p> <p>13 Q. Okay. Do you remember negotiating with the 14 IRS about the tax lien?</p> <p>15 A. I don't know.</p> <p>16 Q. Okay. Did you ever talk with the IRS about 17 the tax lien?</p> <p>18 A. No.</p> <p>19 Q. Okay. Other people handled that?</p> <p>20 A. I don't remember.</p> <p>21 Q. Okay. And I think you answered this in the 22 other deposition, but I want to make sure.</p> <p>23 So you never lent any money to Galleria Loop 24 Note Holder, LLC, did you?</p> <p>25 A. I don't remember.</p>	<p style="text-align: right;">Page 21</p> <p>1 telling you I'm taking the medicine (phonetic) 2 Metamind. It is really strong medicine. I have lost 3 lot of memories.</p> <p>4 Q. Okay. And that was the same medicine I think 5 you told me about at the last deposition?</p> <p>6 A. Yeah, actually this is -- this is hurting, 7 that's why last time I couldn't -- couldn't make it. 8 Not because I was sick, because of this reason.</p> <p>9 Q. Okay. The medicine made you sick you're 10 saying from last time.</p> <p>11 A. Not medicine. Because it's stress and I have 12 bad -- my illness and I was not feeling good since a 13 month and I'm under this and I don't remember a lot of 14 things.</p> <p>15 Q. That's okay.</p> <p>16 A. So -- some, so little bit I know, but mostly 17 I don't remember.</p> <p>18 Q. That's okay. If you don't remember, all you 19 can do is tell me the truth and if the truth is you 20 don't remember, that's fine.</p> <p>21 A. Okay.</p> <p>22 Q. Okay. So if you turn to the last page of 23 this document, it's Bates labeled BRIDGECO 77. It 24 lists several investment properties; do you see that?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 22</p> <p>1 Q. Okay. So I guess if I understand your 2 testimony correctly today, as far as Exhibit 5, you 3 don't recall signing this?</p> <p>4 A. I don't know.</p> <p>5 Q. Okay. Do you have a recollection of signing 6 Exhibit 5?</p> <p>7 A. I don't remember.</p> <p>8 Q. Okay. That's fine. And can you tell the 9 Judge or Jury or Judge Norman why someone would sign an 10 agency agreement like this? Do you have any idea?</p> <p>11 A. I don't have any idea.</p> <p>12 Q. Okay. Do you have a recollection of somebody 13 asking you to sign this document?</p> <p>14 A. I don't know.</p> <p>15 Q. Okay. Are there ever -- are there ever 16 instances where -- be it your son or someone else says, 17 hey, will you please sign this document?</p> <p>18 A. Nobody told me.</p> <p>19 Q. No one told you that you can remember. Does 20 that ever happen just as a matter of practice?</p> <p>21 A. I don't remember.</p> <p>22 Q. Yeah, okay. As you sit here today, 23 Ms. Choudhri, do you have a recollection of a company 24 called Skaneateles RDX, LLC?</p> <p>25 A. I don't know. I don't remember at all.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. This document, if you look at the bottom, 2 it's dated March 19th, 2024, so that was just a few 3 months ago, correct?</p> <p>4 A. Yes.</p> <p>5 Q. Okay.</p> <p>6 MR. CHAUDHRI: Mr. Ballases, do you 7 have a copy of the exhibits for me as well?</p> <p>8 MR. BALLASES: No. They were produced 9 at the last deposition.</p> <p>10 MR. CHAUDHRI: I'm a party, as you 11 know, and so you should at least have a copy for me at 12 this deposition.</p> <p>13 MR. BALLASES: So --</p> <p>14 MR. CHAUDHRI: Is there a reason you 15 don't want to give me a copy of it or --</p> <p>16 MR. BALLASES: Yeah. So they're 17 already produced at the first deposition. The court 18 reporter just brought those exhibits back. So if you 19 didn't bring your exhibits, I'm sorry.</p> <p>20 MR. CHAUDHRI: So you're -- you don't 21 feel you need to give all the parties copies of the 22 deposi- -- copies of the exhibits as you're asking 23 questions?</p> <p>24 MR. BALLASES: Objection, sidebar.</p> <p>25 MR. CHAUDHRI: You don't think</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. Okay.</p> <p>2 A. I don't know what is it, I don't know.</p> <p>3 Q. Okay. So you have no have recollection of a 4 company called Skaneateles RDX --</p> <p>5 A. No, I don't know.</p> <p>6 Q. Okay. Do you have a recollection of a 7 company called Otisco RDX, LLC?</p> <p>8 A. No.</p> <p>9 Q. Okay. Did you ever do any work for either of 10 those two companies?</p> <p>11 A. Never.</p> <p>12 Q. Did you ever get money from those two 13 companies?</p> <p>14 A. I don't know.</p> <p>15 Q. Did you ever loan money to those two 16 companies?</p> <p>17 A. I don't know.</p> <p>18 Q. Okay. You have no recollection of any of 19 those things, though, do you?</p> <p>20 A. I don't remember.</p> <p>21 Q. Could you turn to Exhibit 8. There you go. 22 Exhibit 8 to your deposition is a document titled 23 "Application For Reinstatement and Request to Set Aside 24 Revocation or Forfeiture"; do you see that at the top?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 25</p> <p>1 that's -- that's proper at all?</p> <p>2 Q. (BY MR. BALLASES:) So if you look at --</p> <p>3 MR. CHAUDHRI: Mr. Ballases?</p> <p>4 Q. (BY MR. BALLASES:) -- if you look at the 5 bottom of Exhibit 8, it says -- it's got an E-signature 6 and it says "President of Manager." I'm guessing it's 7 supposed to be President or Manager, but it says 8 "schoudhri"; do you see that?</p> <p>9 A. Uh-huh.</p> <p>10 Q. Okay. Do you have a recollection of 11 authorizing this particular document found in Exhibit 8 12 to be filed?</p> <p>13 A. I don't know about anything.</p> <p>14 Q. Okay. Is there anyone else in your family 15 who would go by the initial "schoudhri" besides 16 yourself?</p> <p>17 A. No, nobody. I don't involve any family.</p> <p>18 Q. Okay.</p> <p>19 MR. CHAUDHRI: I want to object to 20 this, Mr. Ballases, that you're not handing me any of 21 the exhibits and I'm a party in this deposition.</p> <p>22 Mr. Ballases, do you have a -- do you 23 have any exhibits to hand me? Are you not willing to 24 share the exhibits with me?</p> <p>25 MR. BALLASES: You've made your</p>

<p>1 objection on the record. You can stop now.</p> <p>2 MR. CHAUDHRI: But you're not willing</p> <p>3 to share any exhibits?</p> <p>4 MR. BALLASES: I don't have copies.</p> <p>5 They were brought to the first deposition that you</p> <p>6 attended. Everyone got copies then.</p> <p>7 MR. CHAUDHRI: I never got copies of</p> <p>8 the first deposition. You never gave me copies --</p> <p>9 MR. BALLASES: Sorry.</p> <p>10 MR. CHAUDHRI: -- and you're not</p> <p>11 giving me copies again. So you think it's okay that</p> <p>12 I'm a party and you don't give me copies of the</p> <p>13 exhibits?</p> <p>14 MR. BALLASES: Yeah. If you can cite</p> <p>15 a rule that says I have to give you exhibits, then tell</p> <p>16 me. If not, then you can just be quiet. All right?</p> <p>17 Q. (BY MR. BALLASES:) I'm going to now direct</p> <p>18 you to Exhibit 10.</p> <p>19 A. Be patient.</p> <p>20 Q. I will, I apologize. Exhibit --</p> <p>21 A. You have to respect each other.</p> <p>22 Q. Fair enough. So Exhibit 10 to your</p> <p>23 deposition is a document titled "Application for</p> <p>24 Reinstatement and Request to Set Aside Revocation or</p> <p>25 Forfeiture," but this time it's for Otisco; do you see</p>	<p>Page 26</p> <p>1 A. Yes, I can see.</p> <p>2 Q. Okay. And the -- the "Beneficiary" is</p> <p>3 "Skaneateles, RDX, LLC"; do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And it references -- it says a little</p> <p>6 bit beneath that, it says "Promissory Note: As</p> <p>7 provided by Note"; do you see that?</p> <p>8 A. Yes, I can see.</p> <p>9 Q. Do you have -- and the date of this document</p> <p>10 is September 25th of 2022, yes?</p> <p>11 A. Yes, I don't know what is it.</p> <p>12 Q. Okay. So as you sit here today, do you have</p> <p>13 any recollection of Skaneateles loaning money to</p> <p>14 Houston Real Estate Properties?</p> <p>15 A. I don't remember.</p> <p>16 Q. Okay. Did anyone -- did you as the President</p> <p>17 or Manager of Skaneateles authorize this document to be</p> <p>18 entered into?</p> <p>19 A. No, I don't know.</p> <p>20 Q. Okay. Did you as the president or manager of</p> <p>21 Skaneateles ever instruct Skaneateles to loan any money</p> <p>22 to Houston Real Estate Properties, LLC?</p> <p>23 A. Yes, I don't recognize this one.</p> <p>24 Q. Okay. And if you turn to the back, the</p> <p>25 second to last page, I believe. It looks like it's</p>
<p>1 that?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And this document was also filed on</p> <p>4 March 19th of 2024?</p> <p>5 A. Yes, I can see.</p> <p>6 Q. Okay. And, again, it says "President of</p> <p>7 Manager." I'm guessing that means president or</p> <p>8 manager, but it says it's an E-signature and it says by</p> <p>9 "schoudhri"; do you see that?</p> <p>10 A. Yes, I can see, but I don't know about it.</p> <p>11 Q. That's okay. So if I understand your</p> <p>12 testimony correctly today, what you're saying is, you</p> <p>13 don't have a recollection of authorizing this document</p> <p>14 to be filed?</p> <p>15 A. I don't remember.</p> <p>16 Q. Okay. Okay. If you can turn to Exhibit 11.</p> <p>17 Exhibit 11 to your deposition is a -- it's titled "Deed</p> <p>18 of Trust and Security Agreement"; do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And this says the "Grantor" at the top</p> <p>21 is -- I'll give you a second to put your glasses on.</p> <p>22 A. Please.</p> <p>23 Q. Sure. Okay. So this says at the "Grantor"</p> <p>24 of this document is "Houston Real Estate Properties,</p> <p>25 LLC"; do you see that?</p>	<p>Page 27</p> <p>1 signed by -- I can help you. Here you go.</p> <p>2 So if you turn to the second to last page of</p> <p>3 -- of Exhibit 11, it looks like it's signed by Houston</p> <p>4 Real Estate Properties by Dward Darjean; do you</p> <p>5 recognize that name?</p> <p>6 A. Yes.</p> <p>7 Q. Who's Dward Darjean?</p> <p>8 A. He's working for office for a long -- long</p> <p>9 time ago, but I don't remember what is this.</p> <p>10 Q. Okay. Did he ever work for you?</p> <p>11 A. Not for me. I'm not working.</p> <p>12 Q. Okay. I just want to make sure.</p> <p>13 Do you have any recollection of doing any</p> <p>14 work for or with Houston Real Estate Properties, LLC?</p> <p>15 A. No, I don't know. I don't remember.</p> <p>16 Q. If you would have done work with or for that</p> <p>17 company, that would have been way back at the beginning</p> <p>18 that we talked about with your husband the first two or</p> <p>19 three years early, correct?</p> <p>20 A. No, I don't know.</p> <p>21 Q. Okay. When do you think -- strike that.</p> <p>22 And I think you answered this, but just to be</p> <p>23 clear. So you don't have a recollection of ever doing</p> <p>24 any business with or for Houston Real Estate</p> <p>25 Properties?</p>

<p style="text-align: right;">Page 30</p> <p>1 A. I don't remember.</p> <p>2 Q. Okay.</p> <p>3 A. There's a lot of paperwork I don't want to</p> <p>4 follow this everything for long time.</p> <p>5 Q. I understand.</p> <p>6 Do you know who Scarlet MacGeorge is?</p> <p>7 A. No.</p> <p>8 Q. Was -- if you are the manager or president of</p> <p>9 Skaneateles, did you ever authorize Scarlet MacGeorge</p> <p>10 to sign documents on behalf of --</p> <p>11 A. No.</p> <p>12 Q. -- Skaneateles RDX, LLC?</p> <p>13 MS. HOOD: Let him -- let him finish</p> <p>14 asking his question.</p> <p>15 THE WITNESS: Okay.</p> <p>16 Q. (BY MR. BALLASES:) So if you turn to Exhibit</p> <p>17 14, please. Right there. There you go.</p> <p>18 So Exhibit 14 is a "Proof of Claim" that was</p> <p>19 filed by Skaneateles RDX. Do you see that under Box</p> <p>20 No. 1?</p> <p>21 A. Uh-huh.</p> <p>22 Q. Okay. And if you look on the last page, it's</p> <p>23 got an E-signature -- yeah, last page. There you go.</p> <p>24 So if you look on the last page, it has an</p> <p>25 E-signature and it says "Scarlet MacGeorge" and it</p>	<p style="text-align: right;">Page 32</p> <p>1 So Exhibit 16 to your deposition are bank</p> <p>2 statements at Bancorp South for an account that</p> <p>3 yourself and Mr. Ali Choudhri have at that bank; do you</p> <p>4 see that?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And are you familiar -- and you may</p> <p>7 not know this because this isn't common knowledge, but</p> <p>8 so BankCorp South, Cadence Bank, and Icon are all the</p> <p>9 same bank; do you know that or no? And it's okay if</p> <p>10 you don't.</p> <p>11 A. No, I don't know.</p> <p>12 Q. Okay. Well, so this bank statement is for</p> <p>13 BankCorp South and you can see the statement date is</p> <p>14 January 21st of 2022. Do you see that at the top</p> <p>15 right?</p> <p>16 A. Yes, I can see.</p> <p>17 Q. Okay. And the account number is "0076620";</p> <p>18 do you see that?</p> <p>19 A. Yes, but I don't -- I don't remem- -- check</p> <p>20 all my statement. And I don't know which one is on,</p> <p>21 what is going on. I never do.</p> <p>22 Q. Okay. Well let me ask you this: Do you have</p> <p>23 a -- a primary bank that you utilize for day-to-day</p> <p>24 spending?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 31</p> <p>1 lists her as the Authorized Agent for Skaneateles RDX,</p> <p>2 LLC; do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. You certainly didn't make her the authorized</p> <p>5 agent of Skaneateles, did you?</p> <p>6 A. No.</p> <p>7 Q. Okay. And I notice it says email address, it</p> <p>8 says "legal@jetallcompanies.com"; do you see that?</p> <p>9 A. I don't know about that.</p> <p>10 Q. And if you turn to the second page, just one</p> <p>11 page over, I can help you, if you need it.</p> <p>12 Okay. So right there at the top, it says</p> <p>13 that the claim is \$450,000; do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And as you sit here today, you've told</p> <p>16 us you don't recall any loan or debt that Houston Real</p> <p>17 Estate Properties owes to Skaneateles, do you?</p> <p>18 A. Yes.</p> <p>19 Q. Do you recall anything?</p> <p>20 A. No.</p> <p>21 Q. Okay. So this 450,000 noted on this proof of</p> <p>22 claim, you have no idea where this number came from?</p> <p>23 A. Yeah, I don't know.</p> <p>24 Q. Okay. We could turn to Exhibit 16, please.</p> <p>25 There you go.</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. Okay. Well, when you need like to go to the</p> <p>2 grocery store, what -- what -- what funds do you</p> <p>3 utilize? Do you have a debit card or how do you --</p> <p>4 A. Credit card.</p> <p>5 Q. Okay. Is the credit card affiliated with a</p> <p>6 particular bank or account?</p> <p>7 A. No.</p> <p>8 Q. What --</p> <p>9 A. Not -- some bank account. Bank -- under some</p> <p>10 bank, but I'm using this one.</p> <p>11 Q. Okay. So which bank is it?</p> <p>12 A. I don't remember.</p> <p>13 Q. Okay. Well, so Exhibit 16, these Bancorp</p> <p>14 South statements, if you look on that very first page,</p> <p>15 it's -- it's Bates stamped BRIDGECO 78 on the very</p> <p>16 first page.</p> <p>17 A. This one?</p> <p>18 Q. Yeah. So if you look down here at the</p> <p>19 bottom, it says "Deposits and other credits" and on</p> <p>20 December 21st of -- I'm going to guess that's 2021, it</p> <p>21 shows a deposit of "\$5,029,527.91" from "Capital Title</p> <p>22 of Texas"; do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. My question to you is, do you know</p> <p>25 from where these funds originated?</p>

<p style="text-align: right;">Page 34</p> <p>1 A. I don't know.</p> <p>2 Q. Okay. If you turn to -- stay in Exhibit 16, 3 please, but if you turn to BRIDGECO 84 -- it's just a 4 few pages -- yeah, you got it, a couple of pages over. 5 There you go.</p> <p>6 Okay. So BRIDGECO 84, it's got some 7 debits -- first of all, this statement is dated March 8 21st of 2022. Do you see that at the top right?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And it's got some debits in this at 11 the bottom and one is a \$60,000 payment to "Meandering 12 Bend, LLC"; do you recall -- do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Can you tell the Judge what that 15 payment of monies to Meandering Bend, LLC, has to do 16 with?</p> <p>17 A. I don't know.</p> <p>18 Q. Okay.</p> <p>19 A. Because there's so much statements and I 20 would do the statement on that time.</p> <p>21 Q. Right. And you told us at that point in time 22 in 2022 you weren't working, correct?</p> <p>23 A. No.</p> <p>24 Q. That's correct?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 36</p> <p>1 MR. BALLASES: If you didn't bring 2 them with you, I'm sorry if you're not prepared --</p> <p>3 MR. CHAUDHRI: You have not provided 4 me -- are you representing here on the record that you 5 gave me the exhibits at the last deposition?</p> <p>6 MR. BALLASES: They were produced to 7 your parties. So, yes, you got them.</p> <p>8 MR. CHAUDHRI: No, they were not. No, 9 they were not.</p> <p>10 MR. BALLASES: Okay.</p> <p>11 MR. CHAUDHRI: Mr. Ballases, are you 12 -- is that what you're representing on the record that 13 they were produced to all the parties, all the exhibits 14 in the deposition were produced to all the parties, 15 that's what you're saying?</p> <p>16 MR. BALLASES: They were produced.</p> <p>17 There is a copy the court reporter has. Everybody has 18 ordered them.</p> <p>19 MR. CHAUDHRI: No, sir. Mr. Ballases, 20 --</p> <p>21 MR. BALLASES: Yeah. I'm not going to 22 engage. This isn't proper.</p> <p>23 MR. CHAUDHRI: I'm here in this 24 deposition. I'm here in a deposition. I'm a witness 25 and I am a party to this case. You're refusing to hand</p>
<p style="text-align: right;">Page 35</p> <p>1 Q. Okay. So certainly you weren't transacting 2 business with various LLCs and real estate deals, 3 right?</p> <p>4 A. I don't know.</p> <p>5 Q. Well, if you were at home and you weren't 6 working, you weren't doing deals then?</p> <p>7 A. Well, I don't know.</p> <p>8 MR. CHAUDHRI: Objection. You're -- 9 you're misstating her answer from before and that's 10 misleading. That's not what she testified to.</p> <p>11 MR. BALLASES: Okay. Make your 12 objection on the record. No speaking objections.</p> <p>13 MR. CHAUDHRI: And pursuant to Rule 14 30, you're violating by not providing the exhibits 15 you're asking questions of the deponent.</p> <p>16 I'm a party sitting here, and you're 17 refusing to provide exhibits to the other parties in 18 the deposition.</p> <p>19 MR. BALLASES: Okay.</p> <p>20 MR. CHAUDHRI: And you just say you 21 have no -- you have no excuse or reason. You just 22 don't want to do it.</p> <p>23 MR. BALLASES: The deposition -- the 24 exhibits have all been given to everybody.</p> <p>25 MR. CHAUDHRI: I have not --</p>	<p style="text-align: right;">Page 37</p> <p>1 me exhibits in this deposition.</p> <p>2 MR. BALLASES: Okay.</p> <p>3 MR. CHAUDHRI: And you cannot give me 4 any good reason why.</p> <p>5 MR. BALLASES: Okay.</p> <p>6 Q. (BY MR. BALLASES:) So if you look a little 7 bit further on BRIDGECO 84, which is still Exhibit 16 8 --</p> <p>9 MR. CHAUDHRI: Not sharing exhibits, I 10 object to you not sharing exhibits.</p> <p>11 MR. BALLASES: You said that five 12 times. Thank you.</p> <p>13 MR. CHAUDHRI: And you're refusing to 14 do so.</p> <p>15 MR. BALLASES: Thank you for stating 16 your objection on the record.</p> <p>17 MR. CHAUDHRI: Is there a reason 18 you're refusing to do so?</p> <p>19 MR. BALLASES: Do you want to --</p> <p>20 THE WITNESS: Okay. One thing is very 21 important. People respect each other. If he's telling 22 now, you have to answer it. You both should be, but 23 this is not a way to do the things, not like that. I'm 24 not this kind of person that I have to see these 25 things.</p>

Page 38	Page 40
1 MR. BALLASES: Okay.	1 payment, correct?
2 MR. CHAUDHRI: Hiding the exhibits	2 MS. HOOD: Objection, it's not what
3 from the parties --	3 she said --
4 (Ms. Choudhri speaking foreign	4 A. I don't know.
5 language.)	5 MR. CHAUDHRI: Mr. Ballases, please, I
6 MR. CHAUDHRI: I'm putting my	6 object to you misstating her answers. If her answers
7 objection on the record.	7 are "I don't remember," don't misstate what they are.
8 Mr. Ballases, is there some reason you	8 And I'm going to have a running
9 don't want to hand me the exhibits and I'm a party	9 objection for lack of foundation for any questions
10 here? You're asking questions. If the exhibits are	10 because exhibits have not been provided to me.
11 not shared and the objection --- and -- and -- and --	11 Or would you like me to object every
12 and it's a lack of foundation of the questions based on	12 time or can you agree that I have a running objection,
13 the exhibit, there is not foundation for the questions	13 Mr. Ballases?
14 being asked. You're refusing to hand me the exhibits	14 MR. BALLASES: I'd like you to object
15 you're asking questions on.	15 every time.
16 MR. BALLASES: Thank you for stating	16 MR. CHAUDHRI: Okay.
17 your objection on the record. So continuing on --	17 Q. (BY MR. BALLASES:) Okay. If you could turn
18 MR. CHAUDHRI: And you're still going	18 to the next page, BRIDGECO 88, just one page over?
19 to continue to not share the exhibits with me, correct?	19 A. This one?
20 Q. (BY MR. BALLASES:) Do you --	20 Q. Yes, BRIDGECO 88.
21 MR. BALLASES: Mr. Choudhri, with all	21 MR. CHAUDHRI: Objection, lack of
22 due respect, I've gone in front of this Judge I think	22 foundation.
23 like four times having to do with this deposition. If	23 Q. (BY MR. BALLASES:) So if you look at BRIDGECO
24 I go in front of him again, it's going to be more bad	24 88 --
25 news for you. Please, just let me conduct the	25 MR. CHAUDHRI: You're not sharing
Page 39	Page 41
1 deposition --	1 exhibits, Mr. Ballases.
2 MS. HOOD: Uh -- uh -- uh -- can we --	2 Q. (BY MR. BALLASES:) -- there, on there, there
3 can we just stop threatening each other and let her	3 is a deposit or credit in the amount of "\$365,525.66"
4 finish her deposition, please.	4 from "Hudson Title Group, LLC." And if you look a
5 MR. BALLASES: I'm trying, I'm trying.	5 little bit further down in the entry, it says "Seller
6 THE WITNESS: Yes, she can talk now.	6 Proceeds Ali" and it says "CHAUDH," I'm assuming that
7 Just both she can talk and they can talk. Okay. I am	7 means Choudhri, but it doesn't say the full name; do
8 listening.	8 you see that?
9 Q. (BY MR. BALLASES:) Okay. So it's Exhibit 16	9 A. Yes.
10 still, Bates label Page BRIDGECO 84. There is another	10 MR. CHAUDHRI: Objection.
11 entry that shows a debit or a payment of \$213,500 --	11 Q. (BY MR. BALLASES:) Okay. And so can you see
12 A. Where?	12 -- or can you tell the Judge why this deposit of
13 Q. Sure. I'll help you. So Exhibit 16 and	13 365,000 some-odd dollars was made into this account on
14 BRIDGECO 84. There you go.	14 or about June 24th?
15 A. Okay.	15 MR. CHAUDHRI: Objection, opposing
16 Q. Okay. So if you look at the bottom of that	16 counsel's failed to lay the proper --
17 page, there's a debit in the amount of "\$213,500" for	17 A. I don't know --
18 "PBAC 507 Holdings, LLC"; do you see that?	18 MR. CHAUDHRI: Wait -- wait -- let
19 A. Yes.	19 me -- let me get my objection in before you answer the
20 Q. Okay. Can you tell the Judge what that	20 question, please.
21 payment to PBAC 507 Holdings, LLC, pertain to?	21 THE WITNESS: Okay.
22 A. I don't know of any -- I can't explain	22 MR. CHAUDHRI: Objection. You failed
23 anything because it's -- I don't know what for that. I	23 to lay the proper foundation for this question. You
24 don't know.	24 failed to provide the exhibits. Objection, form.
25 Q. You certainly didn't authorize or make that	25 Q. (BY MR. BALLASES:) Okay. Would you like me

<p style="text-align: right;">Page 42</p> <p>1 to restate the question, or do you want to -- do you 2 remember it?</p> <p>3 A. Okay. Yes.</p> <p>4 Q. Okay. So my --</p> <p>5 A. I don't know -- I don't know where the money 6 going and coming. I don't remember because I don't 7 know. Some accounts are closed. Most accounts are 8 closed.</p> <p>9 Q. Okay.</p> <p>10 MR. CHAUDHRI: Objection.</p> <p>11 A. There's so many accounts. You're asking 12 about any account, they're already closed.</p> <p>13 Q. (BY MR. BALLASES:) Okay. So you're saying 14 this account with Bancorp South which is now Cadence is 15 closed?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. So did you -- so do you know on this 18 same page, there are entries and there throughout this 19 document of "Oasis Batch" and then it says "payroll"; 20 do you see that?</p> <p>21 A. Where is?</p> <p>22 Q. Right there. It says "Oasis Batch."</p> <p>23 MR. CHAUDHRI: Objection.</p> <p>24 A. Okay. Maybe I help --</p> <p>25 MR. CHAUDHRI: Objection.</p>	<p style="text-align: right;">Page 44</p> <p>1 your answer for the whole depo?</p> <p>2 MR. BALLASES: I'm going to conduct 3 the deposition. And the longer -- the more times you 4 interject, the longer this is going to take.</p> <p>5 MR. CHAUDHRI: I'm objecting --</p> <p>6 MS. HOOD: Okay. So I just want to 7 let you know that I'm having a 35-minute break 8 schedule.</p> <p>9 MR. BALLASES: Do you want to take a 10 break?</p> <p>11 MS. HOOD: Yeah.</p> <p>12 MR. BALLASES: Ok, that's fine.</p> <p>13 That's fine.</p> <p>14 Let's go off the record.</p> <p>15 THE VIDEOGRAPHER: Off the record at 16 12:07.</p> <p>17 (Off the record.)</p> <p>18 THE VIDEOGRAPHER: We are back on the 19 record at 12:20.</p> <p>20 Q. (BY MR. BALLASES:) Ms. Choudhri, we just took 21 a short break. Are you ready to get going?</p> <p>22 A. Yeah.</p> <p>23 Q. Okay. Thanks.</p> <p>24 If you turn to Exhibit 17 in the exhibits in 25 front of you. Yup, there you go.</p>
<p style="text-align: right;">Page 43</p> <p>1 A. -- I help someone, but this account is closed 2 for long time.</p> <p>3 Q. (BY MR. BALLASES:) Okay. I just --</p> <p>4 A. I don't check the -- no, I don't check this 5 anymore.</p> <p>6 Q. Okay. But my question's a little bit 7 different and I appreciate that.</p> <p>8 But so there's lots of entries that say 9 "Oasis Batch Payroll" --</p> <p>10 A. I don't remember.</p> <p>11 MR. CHAUDHRI: Objection, lack of 12 proper foundation.</p> <p>13 Q. (BY MR. BALLASES:) Okay. So as you sit here 14 today, Ms. Choudhri, do you have any recollection of 15 making a payment to or receiving a payment from Oasis 16 Batch?</p> <p>17 A. I don't know.</p> <p>18 MR. CHAUDHRI: Objection.</p> <p>19 Q. (BY MR. BALLASES:) Can you tell the Judge 20 what Oasis Batch pertains to?</p> <p>21 A. Okay. I don't remember.</p> <p>22 Q. Okay.</p> <p>23 MR. CHAUDHRI: Mr. Ballases, are you 24 going to refuse to provide me any of these exhibits 25 that you're asking questions on? Is that going to be</p>	<p style="text-align: right;">Page 45</p> <p>1 Okay. Exhibit 17 is an account statement for 2 an Icon Bank bank account for it says, yourself and Ali 3 Choudhri. Do you see that?</p> <p>4 A. Yes.</p> <p>5 MR. CHAUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. And this is for 7 account number 76620?</p> <p>8 MR. CHAUDHRI: Objection, form.</p> <p>9 A. I don't know.</p> <p>10 Q. (BY MR. BALLASES:) It says it right there.</p> <p>11 A. Yes, I don't remember.</p> <p>12 MR. CHAUDHRI: Objection, form.</p> <p>13 Q. (BY MR. BALLASES:) That's okay.</p> <p>14 And this account it shows was opened it looks 15 like May 3rd of 2011?</p> <p>16 MR. CHAUDHRI: Objection, form.</p> <p>17 A. I don't know. I don't remember.</p> <p>18 Q. Okay.</p> <p>19 MR. CHAUDHRI: Just wait until I get 20 my objection in, please, before you answer.</p> <p>21 Q. (BY MR. BALLASES:) Okay. So it -- and it 22 shows that the email associated with this account is 23 "dward@jetallcompanies.com"; do you see that?</p> <p>24 A. Yes.</p> <p>25 MR. CHAUDHRI: Objection, form.</p>

<p style="text-align: right;">Page 46</p> <p>1 A. I don't remember this one.</p> <p>2 MR. CHAUDHRI: Well, before you</p> <p>3 answer, let me get my objection on the record.</p> <p>4 Q. (BY MR. BALLASES:) Do you have a recollection</p> <p>5 of opening this bank account with your son, Ali</p> <p>6 Choudhri?</p> <p>7 A. I don't --</p> <p>8 MR. CHAUDHRI: Objection, form.</p> <p>9 MS. HOOD: Okay. He asked a question.</p> <p>10 He's objecting. When he finishes, then you answer.</p> <p>11 Okay. That way, the court reporter can get everybody's</p> <p>12 comments.</p> <p>13 Q. (BY MR. BALLASES:) Okay. So let me re-ask</p> <p>14 the question.</p> <p>15 Do you have a recollection of opening this</p> <p>16 bank account that is shown in Exhibit 17 with yourself</p> <p>17 and your son Ali Choudhri?</p> <p>18 MR. CHAUDHRI: Objection, form.</p> <p>19 A. I don't know.</p> <p>20 Q. (BY MR. BALLASES:) Okay.</p> <p>21 MS. HOOD: Just for clarity of the</p> <p>22 record, is it "I don't know" or "I don't remember"?</p> <p>23 MR. BALLASES: She said "I don't</p> <p>24 know."</p> <p>25 MR. CHAUDHRI: Is your answer for the</p>	<p style="text-align: right;">Page 48</p> <p>1 MR. CHAUDHRI: Objection, form.</p> <p>2 A. Uh-huh.</p> <p>3 Q. (BY MR. BALLASES:) Okay. And, again, the</p> <p>4 email associated with this account is, again,</p> <p>5 "dward@jetallcompanies.com"; do you see that?</p> <p>6 A. I don't remember.</p> <p>7 MR. CHAUDHRI: Objection, form.</p> <p>8 Q. (BY MR. BALLASES:) Okay.</p> <p>9 MR. CHAUDHRI: Wait -- wait until</p> <p>10 I give my objection. So he'll ask the question. I'll</p> <p>11 object, then you can answer. For the court reporter so</p> <p>12 she doesn't get mixed up. So we're not talking over</p> <p>13 each other.</p> <p>14 Q. (BY MR. BALLASES:) So I'm assuming your</p> <p>15 answer will be the same as it was on the previous</p> <p>16 account, but I want to ask.</p> <p>17 So do you have a recollection of opening this</p> <p>18 bank account with your son Ali Choudhri at Icon Bank</p> <p>19 that's reflected in Exhibit 18?</p> <p>20 MR. CHAUDHRI: Objection, form.</p> <p>21 A. Yes. I don't remember.</p> <p>22 Q. (BY MR. BALLASES:) Okay. Could you please</p> <p>23 turn to Exhibit 19 from your previous deposition.</p> <p>24 That's it.</p> <p>25 So Exhibit 19 to your deposition is an</p>
<p style="text-align: right;">Page 47</p> <p>1 record --</p> <p>2 MS. HOOD: I'm asking her.</p> <p>3 Is it "I don't know" or "I don't</p> <p>4 remember," your answer that you just gave?</p> <p>5 THE WITNESS: Okay.</p> <p>6 Q. (BY MR. BALLASES:) What she wants you -- what</p> <p>7 Ms. Hood is asking you to answer is, do you --</p> <p>8 MS. HOOD: I'm asking for</p> <p>9 clarification.</p> <p>10 Is it you don't know or is it that you</p> <p>11 don't remember?</p> <p>12 Q. (BY MR. BALLASES:) Okay. Do you remember</p> <p>13 opening an account with your son at this bank or do you</p> <p>14 not know?</p> <p>15 A. I don't remember.</p> <p>16 Q. Okay. If you turn to Exhibit 18 in front of</p> <p>17 you. There you go. Okay. Exhibit 18, yeah, this is</p> <p>18 18, see, it says it right there.</p> <p>19 Exhibit 18 is another bank account opened at</p> <p>20 Icon Bank between it says yourself and Ali Choudhri.</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 MR. CHAUDHRI: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) This one is for Account</p> <p>25 No. 7662010. Do you see that?</p>	<p style="text-align: right;">Page 49</p> <p>1 account agreement with Cadence Bank and the account</p> <p>2 holder is "Otisco RDX, LLC"; do you see that at the</p> <p>3 top?</p> <p>4 A. Yes.</p> <p>5 MR. CHAUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. And it's for</p> <p>7 Account No. 81966681. Do you see that?</p> <p>8 MR. CHAUDHRI: Objection, form.</p> <p>9 A. Yes.</p> <p>10 Q. (BY MR. BALLASES:) Okay. And it says at the</p> <p>11 bottom of the page it's signed by the -- it says the</p> <p>12 owner of Otisco RDX, LLC, which is -- looks like "S.</p> <p>13 Choudhri"; is that right?</p> <p>14 MR. CHAUDHRI: Objection, form.</p> <p>15 A. Yes. I don't remember about this.</p> <p>16 Q. (BY MR. BALLASES:) Okay. So I think I know</p> <p>17 what your testimony is, which is that you don't</p> <p>18 remember opening this account the way it's shown?</p> <p>19 MR. CHAUDHRI: Objection, form.</p> <p>20 A. I don't know about anything about this</p> <p>21 account.</p> <p>22 MR. CHAUDHRI: Objection, form.</p> <p>23 Q. (BY MR. BALLASES:) Is that your signature</p> <p>24 on -- on Exhibit 19?</p> <p>25 MR. CHAUDHRI: Objection, form.</p>

<p style="text-align: right;">Page 50</p> <p>1 A. I don't know.</p> <p>2 Q. (BY MR. BALLASES:) Okay. So does that look</p> <p>3 like your signature?</p> <p>4 MR. CHOUHDRI: Objection, form.</p> <p>5 A. Maybe. I don't remember.</p> <p>6 Q. (BY MR. BALLASES:) No. I understand you</p> <p>7 don't remember signing it and that's -- that's clear on</p> <p>8 the record. But my question is, does the signature</p> <p>9 that purports to be Shahnaz Choudhri's signature on</p> <p>10 Exhibit 19, does that look like your signature?</p> <p>11 MR. CHOUHDRI: Objection, form.</p> <p>12 MS. HOOD: I think she's answered your</p> <p>13 question.</p> <p>14 A. I don't know. I don't know. I don't know</p> <p>15 about that.</p> <p>16 Q. (BY MR. BALLASES:) Okay. Could you please</p> <p>17 turn to Exhibit 22. Yeah, right there. There you go.</p> <p>18 So Exhibit 22 to your first deposition is a</p> <p>19 document titled "Account Agreement" for "BancorpSouth</p> <p>20 Bank (a division of Cadence Bank); do you see that?</p> <p>21 MR. CHOUHDRI: Objection, form.</p> <p>22 A. Yes.</p> <p>23 Q. (BY MR. BALLASES:) Okay. And it says the</p> <p>24 account holder is Shahnaz Choudhri; is that right?</p> <p>25 MR. CHOUHDRI: Objection, form.</p>	<p style="text-align: right;">Page 52</p> <p>1 A. I don't remember.</p> <p>2 Q. (BY MR. BALLASES:) Okay. Do you recall</p> <p>3 having a bank account with Cadence Bank at all?</p> <p>4 A. Yes.</p> <p>5 MR. CHOUHDRI: Objection, form.</p> <p>6 A. Since I have -- not feeling good, my memory</p> <p>7 has gone bad and that's why I don't remember most of</p> <p>8 things. And then this is old things that I don't take</p> <p>9 it, no, easily.</p> <p>10 Q. (BY MR. BALLASES:) Okay.</p> <p>11 A. You can understand my situation now.</p> <p>12 Q. I understand. I appreciate you telling me.</p> <p>13 Could you turn to -- let me tab it. So I'm</p> <p>14 going to tab Exhibit 22 for you so you can get back to</p> <p>15 it easy. But can you turn to Exhibit 23, please.</p> <p>16 Okay. So Exhibit 23 is another account</p> <p>17 agreement with Cadence Bank for the account holder</p> <p>18 Shahnaz Choudhri. Do you see that at the top?</p> <p>19 MR. CHOUHDRI: Objection, form.</p> <p>20 A. Yes.</p> <p>21 Q. (BY MR. BALLASES:) Okay. And this is for the</p> <p>22 same account that we just looked at in Exhibit 22,</p> <p>23 which is 79714333. Do you see that?</p> <p>24 MR. CHOUHDRI: Objection, form.</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 51</p> <p>1 A. I don't know.</p> <p>2 Q. (BY MR. BALLASES:) It says it right there?</p> <p>3 A. Yes.</p> <p>4 Q. Okay.</p> <p>5 MR. CHOUHDRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) And this is for Account</p> <p>7 No. 79714333. Do you see that?</p> <p>8 MR. CHOUHDRI: Objection, form.</p> <p>9 A. Yes.</p> <p>10 Q. (BY MR. BALLASES:) Okay. And it says that</p> <p>11 this account was opened August 29th of 2022.</p> <p>12 MR. CHOUHDRI: Objection, form.</p> <p>13 A. I don't know.</p> <p>14 Q. (BY MR. BALLASES:) It says it right up there.</p> <p>15 MR. CHOUHDRI: Objection, form.</p> <p>16 A. Yeah, I don't remember.</p> <p>17 Q. (BY MR. BALLASES:) Yeah. I understand if you</p> <p>18 don't remember. I'm just asking you to verify certain</p> <p>19 things right now.</p> <p>20 A. Okay.</p> <p>21 Q. So as you sit here today, with respect to</p> <p>22 Exhibit 22 and the account that's described there in</p> <p>23 that account agreement, do you recall opening this</p> <p>24 account with the bank?</p> <p>25 MR. CHOUHDRI: Objection, form.</p>	<p style="text-align: right;">Page 53</p> <p>1 Q. (BY MR. BALLASES:) Okay. This one, though,</p> <p>2 this account agreement is dated October 13th, 2022,</p> <p>3 though, which is a few months after the -- the August</p> <p>4 date that we saw on Exhibit 22; is that right?</p> <p>5 MR. CHOUHDRI: Objection, form.</p> <p>6 A. Yes.</p> <p>7 Q. (BY MR. BALLASES:) Okay. This one here, if</p> <p>8 you look at the bottom, it's got a -- it says</p> <p>9 "Convenience Signer Designation"; do you see that?</p> <p>10 A. Uh-huh.</p> <p>11 Q. Okay. And it says "You have designated" --</p> <p>12 I'm going to read it. That "You have designated ALI</p> <p>13 CHOUHDRI to act on your behalf as Convenience Signer,</p> <p>14 assessing the account solely for the convenience of the</p> <p>15 parties." Do you see that?</p> <p>16 MR. CHOUHDRI: Objection, form.</p> <p>17 A. Yes, I can see.</p> <p>18 Q. (BY MR. BALLASES:) Okay. Do you have a</p> <p>19 recollection of going to the bank -- going to Cadence</p> <p>20 Bank and telling Cadence Bank that Ali Choudhri can now</p> <p>21 sign for checks on your behalf for this account that's</p> <p>22 in your name?</p> <p>23 MR. CHOUHDRI: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) Do you remember that or</p> <p>25 not?</p>

<p style="text-align: right;">Page 54</p> <p>1 A. No. I don't know what you're talking about. 2 I don't remember.</p> <p>3 Q. Okay. Do you remember going to a bank just 4 generally and saying, you know what, Bank, I want it so 5 my son Ali Choudhri can sign my name on checks?</p> <p>6 MR. CHAUDHRI: Objection, form.</p> <p>7 A. No.</p> <p>8 Q. (BY MR. BALLASES:) Did you ever do that?</p> <p>9 MR. CHAUDHRI: Objection, form.</p> <p>10 A. No.</p> <p>11 Q. (BY MR. BALLASES:) Okay. Okay. Would you 12 mind turning to Exhibit 24. There you go.</p> <p>13 Okay. Exhibit 24 is a Cadence Bank statement 14 for Otisco RDX, LLC. Do you see that?</p> <p>15 MR. CHAUDHRI: Objection, form.</p> <p>16 A. Yes.</p> <p>17 Q. (BY MR. BALLASES:) Okay. And it looks like 18 the statement date for the first page of this exhibit 19 is May 31st, 2023. Do you see that?</p> <p>20 A. Yes.</p> <p>21 MR. CHAUDHRI: Objection, form.</p> <p>22 Q. (BY MR. BALLASES:) And the Account Number is 23 81966681. Do you see that?</p> <p>24 A. Yes.</p> <p>25 MR. CHAUDHRI: Objection, form.</p>	<p style="text-align: right;">Page 55</p> <p>1 Q. (BY MR. BALLASES:) Sure. So we're still on 2 Exhibit 24.</p> <p>3 A. 25th or 24?</p> <p>4 Q. 24. And see that entry right there. It's -- 5 and I'll just repeat it since you've got -- so you've 6 got it in front of you. It's \$454,261.50 from Fidelity 7 National Title Agency, Inc. Do you see that?</p> <p>8 MR. CHAUDHRI: Objection, form.</p> <p>9 A. Since I don't know about anything.</p> <p>10 Q. (BY MR. BALLASES:) Okay. So I think what 11 you're telling me is, you cannot tell the Judge why 12 that money was deposited into Otisco RDX, LLC's account 13 as reflected on Page 1 of Exhibit 24?</p> <p>14 MR. CHAUDHRI: Objection, form.</p> <p>15 A. Yes. I don't know about.</p> <p>16 Q. (BY MR. BALLASES:) Okay. If you turn to the 17 bank statement in Exhibit 24 that is June 30th, 2023. 18 And I can help you. That may be it. Yes, that's it.</p> <p>19 On this particular bank statement, the June 20 30th, 2023 bank statement in Exhibit 24, it shows a 21 debit or a payment of \$150,000 to Akin Gump Strauss 22 Hauer & Field -- Feld, LLP. Do you see that?</p> <p>23 A. Yes.</p> <p>24 MR. CHAUDHRI: Objection, form.</p> <p>25 Q. (BY MR. BALLASES:) Okay. Did you ever</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. (BY MR. BALLASES:) Okay. On this particular 2 page, the first page of Exhibit 24, it says that there 3 is a deposit or credit of \$100,000 from Checking 4 Account 79714333. Do you see that?</p> <p>5 MR. CHAUDHRI: Objection, form.</p> <p>6 Objection, form.</p> <p>7 A. Yeah. I don't know which one this is.</p> <p>8 Q. (BY MR. BALLASES:) Sure.</p> <p>9 A. Yes, I can see.</p> <p>10 Q. Okay. So do you -- can you tell Judge Norman 11 why this money was transferred from this particular 12 account, the 79714333 account, which is your account, 13 into this Otisco bank account that's shown on Exhibit 14 24?</p> <p>15 MR. CHAUDHRI: Objection, form.</p> <p>16 A. Yes. I don't know.</p> <p>17 Q. (BY MR. BALLASES:) Okay. You don't remember?</p> <p>18 A. Yes. I don't know what I --</p> <p>19 Q. Okay. That's okay.</p> <p>20 And so if you look in the next entry, which 21 is also May 18th of 2023 on the first page of Exhibit 22 24, it shows a deposit of 454,261.51 from Fidelity 23 National Title Agency, Inc. Do you see that entry?</p> <p>24 MR. CHAUDHRI: Objection, form.</p> <p>25 A. Which one?</p>	<p style="text-align: right;">Page 57</p> <p>1 authorize Otisco to make \$150,000 payment to the law 2 firm of Akin Gump Strauss Hauer & Feld?</p> <p>3 MR. CHAUDHRI: Objection, form.</p> <p>4 A. I don't know about it.</p> <p>5 Q. (BY MR. BALLASES:) Okay. So as you sit here 6 today, you can't remember authorizing that payment?</p> <p>7 A. I don't know.</p> <p>8 Q. Okay.</p> <p>9 MR. CHAUDHRI: Is your answer, just to 10 clarify, he's asking if you remember. Is your answer 11 you don't remember or you don't know because he just 12 asked you if you remember.</p> <p>13 A. Yes. I don't remember.</p> <p>14 MR. CHAUDHRI: I want to make sure the 15 record is clear.</p> <p>16 Q. (BY MR. BALLASES:) Okay. So if you turn to 17 --</p> <p>18 MR. CHAUDHRI: So your answer was you 19 don't remember?</p> <p>20 MS. HOOD: I think that's what she 21 said.</p> <p>22 MR. CHAUDHRI: Okay. I just want to 23 make sure the court report has it clear.</p> <p>24 Q. (BY MR. BALLASES:) If you turn to -- stay on 25 the same exhibit, Exhibit 24, but if you turn to the</p>

<p style="text-align: right;">Page 58</p> <p>1 bank statement that is August 31st, 2023. I can help 2 you. There you go.</p> <p>3 Okay. So the August 31st, 2023 bank 4 statement for Otisco shows a debit, which means a 5 payment, of \$50,000 to Jetwall Companies. I think it 6 means Jetall, but it says J-E-T-W-A-L-L Companies. Do 7 you see that entry?</p> <p>8 MR. CHAUDHRI: Objection, form.</p> <p>9 MS. HOOD: Let me see. What did you 10 say?</p> <p>11 THE WITNESS: The Jetall --</p> <p>12 MR. BALLASES: Jetwall. I think it 13 means Jetall, but it says Jetwall.</p> <p>14 MS. HOOD: Okay. But now you're 15 testifying about what a document says. So I'm going to 16 object --</p> <p>17 MR. BALLASES: I'm just asking her if 18 she sees it.</p> <p>19 MS. HOOD: I'm going to object to 20 form.</p> <p>21 MR. CHAUDHRI: Objection. Objection, 22 form.</p> <p>23 Q. (BY MR. BALLASES:) Okay. Do you see the 24 entry?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 60</p> <p>1 question is -- and I'll restate it for you because 2 everyone wanted to talk.</p> <p>3 The \$50,000 debit to Jetall Companies that 4 came from this particular bank account, the Otisco RDX 5 Cadence Bank account on August 14th of 2023, did you 6 authorize that payment to be made?</p> <p>7 MR. CHAUDHRI: Objection, form.</p> <p>8 A. I don't remember.</p> <p>9 Q. (BY MR. BALLASES:) Okay. If you turn to -- 10 stay on that same exhibit, Exhibit 24, but turn to the 11 September 30th bank statement. There you go.</p> <p>12 So the Exhibit 24 Cadence Bank, Otisco RDX, 13 LLC, account statement date September 30th, 2023 shows 14 a couple of debits that I want to talk about.</p> <p>15 The first one is on September 21st of 2023 16 and it's \$50,000 to Akin Gump Strauss Hauer & Feld. Do 17 you see that?</p> <p>18 MR. CHAUDHRI: Objection, form.</p> <p>19 A. Yes.</p> <p>20 Q. (BY MR. BALLASES:) Okay. Can you tell the 21 Court what that payment was for?</p> <p>22 MR. CHAUDHRI: Objection, form.</p> <p>23 A. I don't know. I don't remember.</p> <p>24 Q. (BY MR. BALLASES:) Okay. Did you authorize 25 that payment to be made from this account?</p>
<p style="text-align: right;">Page 59</p> <p>1 Q. Can you tell Judge Norman why this bank 2 account, the Otisco RDX, LLC, bank account paid Jetall 3 \$50,000 on August 14th of 2023?</p> <p>4 MR. CHAUDHRI: Object to form.</p> <p>5 MS. HOOD: Object to form. That's not 6 what the document says.</p> <p>7 A. No. I don't know.</p> <p>8 Q. (BY MR. BALLASES:) Okay. Did you authorize 9 this payment or this -- or this payment that's 10 transferred of \$50,000 to Jetall Companies?</p> <p>11 MS. HOOD: Objection. Object to form.</p> <p>12 MR. CHAUDHRI: Objection, form.</p> <p>13 MS. HOOD: That's not what the 14 document says.</p> <p>15 MR. BALLASES: Okay. Make your 16 objection to form and move on.</p> <p>17 MR. CHAUDHRI: Misstates what the 18 document says. And I don't even have the document, so 19 I object to asking questions without providing the 20 document.</p> <p>21 MS. HOOD: You can answer --</p> <p>22 MR. BALLASES: Thank you.</p> <p>23 MS. HOOD: -- if you know. If you 24 know, you can answer.</p> <p>25 Q. (BY MR. BALLASES:) Right. So my -- my</p>	<p style="text-align: right;">Page 61</p> <p>1 MR. CHAUDHRI: Objection, form.</p> <p>2 A. No.</p> <p>3 Q. (BY MR. BALLASES:) Okay. If you go just a 4 little bit two -- two entries down on September 29th, 5 2023, it shows a debit in the amount of \$187,235.60 to 6 Caz Creek Holdings. Do you see that?</p> <p>7 A. Yes.</p> <p>8 MR. CHAUDHRI: Objection, form.</p> <p>9 Q. (BY MR. BALLASES:) Okay. Can you tell the 10 Judge what that payment has to do with?</p> <p>11 MR. CHAUDHRI: Objection, form.</p> <p>12 A. I don't know.</p> <p>13 Q. (BY MR. BALLASES:) Did you authorize that 14 payment to be made from this account to Caz Creek 15 Holdings?</p> <p>16 MR. CHAUDHRI: Objection, form.</p> <p>17 A. I don't remember.</p> <p>18 Q. (BY MR. BALLASES:) Okay. Okay. If you could 19 turn to Exhibit 25 from your first deposition. This is 20 now -- it's a -- it's a -- it's another Cadence Bank 21 bank statement, but it's from the Account No. 79714333. 22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 MR. CHAUDHRI: Objection, form.</p> <p>25 Q. (BY MR. BALLASES:) And so this account is in</p>

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1 your name. It's not in Otisco anymore. It's in 2 Shahnaz Choudhri's name. Do you see that?	1 objections? 2 THE REPORTER: I'm getting them, but you 3 can --
3 A. Yes.	4 MR. CHAUDHRI: You are? Okay. I want to 5 make sure you are. All right. Thanks.
4 MR. CHAUDHRI: Objection, form.	6 Q. (BY MR. BALLASES:) Okay. So a little bit 7 further down, the next entry on that same day, 8 September 20th, it shows a \$2 million deposit into your 9 account. Do you see that?
5 Q. (BY MR. BALLASES:) Okay. When look at the 6 first page of Exhibit 25, it's a statement dated 7 September 12th, 2022, it shows a deposit of one million 8 dollars made on August 29th of 2022. Do you see that 9 entry?	10 A. Yes.
10 A. Yes.	11 MR. CHAUDHRI: Objection, form.
11 MR. CHAUDHRI: Objection, form.	12 Q. (BY MR. BALLASES:) Okay. Can you tell the 13 Court from where that million dollars originated?
12 Q. (BY MR. BALLASES:) Okay. Can you tell the 13 Court from where that million dollars originated?	14 MR. CHAUDHRI: Objection, form.
13 MR. CHAUDHRI: Objection, form.	15 A. I don't remember.
14 A. I don't know.	16 Q. (BY MR. BALLASES:) Do you have a recollection 17 of making this two-million-dollar deposit into this 18 particular account that is reflected in Exhibit 25?
15 Q. (BY MR. BALLASES:) Okay.	19 MR. CHAUDHRI: Objection, form.
16 MR. CHAUDHRI: And for the record, 17 Beth Mendez is still in this room in this deposition 18 over our objection. Yet, she has no right to be here. 19 And she's here making gestures to the other parties,	20 A. I don't know.
20 MR. CHAUDHRI: Objection, form.	21 Q. (BY MR. BALLASES:) Okay. If we look a little 22 bit further down, the next entry is from October 3rd, 23 2022 and it shows a deposit or credit of \$1,901,054.13 24 from Fidelity National Title, Inc. Do you see that?
21 MR. CHAUDHRI: Objection, form.	25 MR. CHAUDHRI: Objection, form.
Page 63	Page 65
1 and she should not be in this deposition and she's not 2 a party.	1 A. Yeah.
3 MR. BALLASES: Okay. Thank you for 4 your speaking objection and, no, she's not making 5 gestures to anybody.	2 Q. (BY MR. BALLASES:) Okay. Can you tell the 3 Court from where this 1.9 million originated from?
4 Q. (BY MR. BALLASES:) Ms. Choudhri, --	4 MR. CHAUDHRI: Objection, form.
5 MR. CHAUDHRI: What -- what grounds 6 does she have a right to be here, Mr. Ballases?	5 A. I don't remember.
6 Q. (BY MR. BALLASES:) -- if you turn to the 7 statement dated October 13th -- I think this is it -- 8 2022, yes -- of this -- of the same exhibit, Exhibit 9 25, there are a few entries I want to discuss.	6 Q. (BY MR. BALLASES:) Okay. Can you -- do you 7 have a recollection of making this particular \$1.9 8 million deposit into this account?
7 The first one is a deposit in the amount of 8 \$50,000 -- or excuse me -- \$50,010 made on September 9 20th of 2022. Do you see that first one?	9 MR. CHAUDHRI: Objection, form.
8 MR. CHAUDHRI: Objection, form.	10 A. I don't.
9 A. Yes.	11 Q. (BY MR. BALLASES:) Okay. It's okay.
10 Q. (BY MR. BALLASES:) Okay. Can you tell the 11 Judge where that money originated from?	12 If you go a little bit further down, there's 13 a debit -- it says "other debits" and it also shows on 14 September 20th a one-million-dollar or \$1,000,010 15 checking withdrawal from this same account.
11 MR. CHAUDHRI: Objection, form.	16 MR. CHAUDHRI: Objection, form.
12 A. I don't remember.	17 Q. (BY MR. BALLASES:) And this is the same bank 18 statement, which is October 13th, 2023. Do you see 19 that entry?
13 MR. CHAUDHRI: Do I need a mic or I'm 14 okay?	20 A. Yes.
14 Q. (BY MR. BALLASES:) Okay.	21 MR. CHAUDHRI: Objection, form.
15 MR. CHAUDHRI: Are you getting my	22 Q. (BY MR. BALLASES:) Do you remember 23 withdrawing a little over a million dollars on 24 September 20th from this bank account?
16	25 MR. CHAUDHRI: Objection, form.

<p style="text-align: right;">Page 66</p> <p>1 A. I don't.</p> <p>2 Q. (BY MR. BALLASES:) You don't remember</p> <p>3 withdrawing --</p> <p>4 MS. HOOD: Was it, I don't remember --</p> <p>5 A. I don't remember.</p> <p>6 MS. HOOD: Okay. Thank you.</p> <p>7 Q. (BY MR. BALLASES:) And then it shows one</p> <p>8 entry down on October 3rd of 2022, it shows \$747,000</p> <p>9 payment to Fidelity National Title Insurance, and it</p> <p>10 references "Shepherd-Huldy Development"; do you see</p> <p>11 that?</p> <p>12 MR. CHAUDHRI: Objection, form.</p> <p>13 A. Yes.</p> <p>14 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>15 Court why this \$747,000 was paid to Fidelity National</p> <p>16 Title Agency?</p> <p>17 MR. CHAUDHRI: Objection, form.</p> <p>18 A. I don't remember.</p> <p>19 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>20 this payment to come out of your account?</p> <p>21 MR. CHAUDHRI: Objection, form.</p> <p>22 A. I don't remember.</p> <p>23 Q. (BY MR. BALLASES:) Okay. If we turn to the</p> <p>24 bank statement that is December 9th, 2022. And I'll</p> <p>25 get it for you real quick.Oops. Missed it. Here you</p>	<p style="text-align: right;">Page 68</p> <p>1 Here you go.</p> <p>2 Okay. So still looking at Exhibit 25, it is</p> <p>3 your Cadence Bank bank statements from Account No.</p> <p>4 79714333. There are a couple of -- there's one entry I</p> <p>5 want to discuss on here.</p> <p>6 It shows a debit made on January 30th of 2023</p> <p>7 in the amount of \$2,551,000 to Heritage Title</p> <p>8 Commercial of Austin. And it references a GF number</p> <p>9 and then says "JPB, PBAC 507"; do you see that?</p> <p>10 A. Yes.</p> <p>11 MR. CHAUDHRI: Objection, form.</p> <p>12 Q. (BY MR. BALLASES:) Can you tell the Court</p> <p>13 where this \$2.551 million payment was made to Heritage</p> <p>14 Title Commercial of Austin?</p> <p>15 MR. CHAUDHRI: Objection, form.</p> <p>16 A. I don't remember.</p> <p>17 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>18 this 2.5 same-odd million-dollar payment to be made out</p> <p>19 of your personal account?</p> <p>20 MR. CHAUDHRI: Objection, form.</p> <p>21 A. I don't know.</p> <p>22 Q. (BY MR. BALLASES:) Okay. Do you recall or</p> <p>23 you don't recall?</p> <p>24 MR. CHAUDHRI: Objection, form.</p> <p>25 A. No. I don't want to -- I don't know about</p>
<p style="text-align: right;">Page 67</p> <p>1 go. There you go.</p> <p>2 So still looking at Exhibit 25, which is your</p> <p>3 Cadence Bank bank account or one of your Cadence Bank</p> <p>4 bank accounts, Account No. 79714333, I see a debit on</p> <p>5 the December 9th, 2022 statement of half a million</p> <p>6 dollars to "Romspen US Master Mortgage LP"; do you see</p> <p>7 that?</p> <p>8 MR. CHAUDHRI: Objection, form.</p> <p>9 A. Yes.</p> <p>10 Q. (BY MR. BALLASES:) Right here.</p> <p>11 A. Okay.</p> <p>12 Q. Okay. My question is to you, Ms. Choudhri,</p> <p>13 do you have a recollection of why this</p> <p>14 half-a-million-dollar payment to Romspen was made?</p> <p>15 MR. CHAUDHRI: Objection, form.</p> <p>16 A. I don't remember.</p> <p>17 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>18 this half a million dollars to come out of this</p> <p>19 account, your personal account, to go to Romspen?</p> <p>20 MR. CHAUDHRI: Objection, form.</p> <p>21 MS. HOOD: Objection, form.</p> <p>22 A. I don't remember.</p> <p>23 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>24 February 9th, 2023 bank statement within Exhibit 25,</p> <p>25 I'll get it for you. I keep going one too far here.</p>	<p style="text-align: right;">Page 69</p> <p>1 anything.</p> <p>2 Q. (BY MR. BALLASES:) Okay. Of course, you've</p> <p>3 never done business with PBAC 507 Holdings, LLC; isn't</p> <p>4 that right?</p> <p>5 MR. CHAUDHRI: Objection, form.</p> <p>6 A. I don't know.</p> <p>7 Q. (BY MR. BALLASES:) Okay.</p> <p>8 MS. HOOD: She said I don't know or I</p> <p>9 don't remember?</p> <p>10 Ms. Choudhri, is it "I don't know" or</p> <p>11 "I don't remember," your answer you just said? Is it</p> <p>12 "I don't know" or "I don't remember"?</p> <p>13 MR. BALLASES: I'll repeat the</p> <p>14 question.</p> <p>15 MS. HOOD: Okay.</p> <p>16 Q. (BY MR. BALLASES:) So --</p> <p>17 MR. CHAUDHRI: Her question was, is</p> <p>18 your answer "I don't know" or "I don't remember"</p> <p>19 because it wasn't clear.</p> <p>20 MR. BALLASES: So let me re-ask the</p> <p>21 question.</p> <p>22 Q. (BY MR. BALLASES:) So PBAC 507 Holdings, LLC,</p> <p>23 you don't have a recollection of ever doing business</p> <p>24 with that company; isn't that right?</p> <p>25 A. No. I don't know. I don't remember.</p>

<p style="text-align: right;">Page 70</p> <p>1 Q. Okay. Are you familiar that PBAC or do you 2 know that PBAC 507 Holdings, LLC, is a company that Ali 3 Choudhri is a member of?</p> <p>4 A. I don't remember.</p> <p>5 MR. CHAUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. If you turn to 7 Exhibit 27 of your deposition. Okay. Exhibit 27 to 8 your deposition are more Cadence Bank statements. This 9 one is for Account No. 0076620. Do you see that?</p> <p>10 MR. CHAUDHRI: Objection, form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. BALLASES:) Okay. And this account is 13 in the name of yourself and Mr. Ali Choudhri, correct?</p> <p>14 MR. CHAUDHRI: Objection, form.</p> <p>15 A. Yes.</p> <p>16 Q. (BY MR. BALLASES:) Okay. I would like for 17 you to turn to the statement in Exhibit 27, that is 18 dated April 22nd, 2019. And I can help you. April 19 22nd, 2019. There you go.</p> <p>20 All right. April 22nd, 2019, there are a 21 couple of entries that I wanted to ask you about.</p> <p>22 The first one -- well, strike that.</p> <p>23 So you see this is a statement dated April 24 22nd, 2019?</p> <p>25 MR. CHAUDHRI: Objection, form.</p>	<p style="text-align: right;">Page 72</p> <p>1 bank statement that is labeled May 22nd, 2019, there is 2 a credit listed of \$90,000 that was made on May 20th of 3 2019 for "BDFI, LLC"; do you see that?</p> <p>4 A. Yes.</p> <p>5 MR. CHAUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. Do you have any -- 7 strike that.</p> <p>8 Can you tell the Court why that \$90,000 9 payment was made to BDFI, LLC?</p> <p>10 MR. CHAUDHRI: Objection, form.</p> <p>11 A. I don't know.</p> <p>12 MS. HOOD: Again, is it "I don't know" 13 or "I don't remember"?</p> <p>14 Ms. Choudhri, is your answer is "I 15 don't know" or "I don't remember"?</p> <p>16 THE WITNESS: Okay.</p> <p>17 MS. HOOD: No, no, no. Which one is 18 it, "I don't know" or "I don't remember"?</p> <p>19 MR. BALLASES: She said "I don't 20 know."</p> <p>21 MS. HOOD: Okay. But I'm trying -- 22 Okay. But every time she says, "I don't know," I think 23 she means "I don't remember." I'm just trying to 24 clarify the record because I don't want you coming back 25 and putting words in her mouth. Right?</p>
<p style="text-align: right;">Page 71</p> <p>1 A. Yes.</p> <p>2 Q. (BY MR. BALLASES:) Okay. And the first entry 3 I want to ask you about is a debit and it's dated March 4 26th of 2019, and it shows \$30,000 and it says "Jetall 5 Companies, Inc., Operating"; do you see that entry?</p> <p>6 MR. CHAUDHRI: Objection, form.</p> <p>7 A. Yes.</p> <p>8 Q. (BY MR. BALLASES:) Okay. Do you have any 9 idea what that \$30,000 payment was for?</p> <p>10 MR. CHAUDHRI: Objection, form.</p> <p>11 A. I don't know.</p> <p>12 Q. (BY MR. BALLASES:) Did you authorize that 13 payment to be made?</p> <p>14 A. I don't know.</p> <p>15 MR. CHAUDHRI: Objection, form.</p> <p>16 MS. HOOD: Again, is it "I don't know" 17 or "I don't remember"? I want to make the record 18 clear.</p> <p>19 Do you not remember --</p> <p>20 THE WITNESS: I don't remember. I 21 don't know.</p> <p>22 MS. HOOD: Okay.</p> <p>23 Q. (BY MR. BALLASES:) Okay. If you turn to May 24 22nd, 2019, that bank statement. Okay. There you go.</p> <p>25 So staying within Exhibit 27, turning to the</p>	<p style="text-align: right;">Page 73</p> <p>1 MR. BALLASES: I'm just --</p> <p>2 MS. HOOD: Is it -- is it you don't 3 know or you don't remember?</p> <p>4 THE WITNESS: Okay.</p> <p>5 MS. HOOD: No, no. Don't "okay" me.</p> <p>6 Is it -- is your answer "I don't know" or "I don't 7 remember"? Is it "I don't remember"?</p> <p>8 THE WITNESS: I don't remember.</p> <p>9 MS. HOOD: Okay.</p> <p>10 Q. (BY MR. BALLASES:) Okay. So as you sit here 11 today, can you tell the Court whether or not you 12 particularly -- you, specifically, authorized this 13 \$90,000 payment --</p> <p>14 MR. CHAUDHRI: Objection, form.</p> <p>15 Q. (BY MR. BALLASES:) -- to be made to BDI -- 16 BDFI, LLC, from this account?</p> <p>17 MR. CHAUDHRI: Objection, form.</p> <p>18 A. I don't remember.</p> <p>19 Q. (BY MR. BALLASES:) Okay. Okay. If you turn 20 to the April 22nd, 2020 statement of Exhibit 27 -- went 21 too far again. Here you go.</p> <p>22 Okay. So still looking at Exhibit 27, which 23 is a Cadence Bank bank account with you and Ali 24 Choudhri, Account No. 0076620. On the April 22nd, 2020 25 statement, there is a deposit on April 6th of 2020 of</p>

<p style="text-align: right;">Page 74</p> <p>1 \$160,000 from "VGRP Holdings, LLC"; do you see that 2 entry?</p> <p>3 MR. CHAUDHRI: Objection, form.</p> <p>4 A. Yes.</p> <p>5 Q. (BY MR. BALLASES:) Okay. Can you tell the 6 Court from where this \$160,000 originated?</p> <p>7 MR. CHAUDHRI: Objection, form.</p> <p>8 A. I don't know about it.</p> <p>9 Q. (BY MR. BALLASES:) Okay. Can you tell the 10 Court why it was made?</p> <p>11 A. I don't remember.</p> <p>12 MR. CHAUDHRI: Objection, form.</p> <p>13 Q. (BY MR. BALLASES:) Okay. So could you turn 14 to -- staying within Exhibit 27, could you turn to the 15 bank statement that is dated June 19th, 2020. I can 16 help you find it. There you go.</p> <p>17 So, Ms. Choudhri, on this particular bank 18 statement there is a deposit or credit that was made on 19 June 17th of 2020 in the amount of \$87,129.38 from 20 "Greenville Tower Medical Investors." It says "Final 21 Distribution"; do you see that?</p> <p>22 MR. CHAUDHRI: Objection, form.</p> <p>23 A. Yes.</p> <p>24 Q. (BY MR. BALLASES:) Okay. Can you tell the 25 Court why this \$87,000 deposit was made?</p>	<p style="text-align: right;">Page 76</p> <p>1 MS. HOOD: Because you don't remember? 2 THE WITNESS: I don't remember even. 3 MS. HOOD: Okay. Well, you need to be 4 clear when you answer his questions. Okay. 5 THE WITNESS: Okay. I will. 6 MS. HOOD: Okay. 7 MR. BALLASES: For the record, I think 8 you're doing great. 9 MS. HOOD: For the record, you're not 10 being fair to her, but keep going. 11 MR. BALLASES: Objection, sidebar. 12 MS. HOOD: I object to your sidebar. 13 That's all you've been doing. 14 Q. (BY MR. BALLASES:) If you -- staying within 15 Exhibit 27, if you could turn to the -- 16 MS. HOOD: Okay. We're taking a 17 break. It's at 35 minutes. 18 MR. BALLASES: Okay. 19 THE VIDEOGRAPHER: Off the record at 20 12:55. 21 (Off the record.) 22 THE VIDEOGRAPHER: We are back on the 23 record at 1:11. 24 Q. (BY MR. BALLASES:) Okay. Hi, Ms. Choudhri, 25 how are you?</p>
<p style="text-align: right;">Page 75</p> <p>1 MR. CHAUDHRI: Objection, form.</p> <p>2 A. I don't know.</p> <p>3 MS. HOOD: Again, is it "I don't know" 4 or "I don't remember"?</p> <p>5 Ms. Choudhri, --</p> <p>6 MR. BALLASES: She said "I don't 7 know," I mean.</p> <p>8 MR. CHAUDHRI: We're trying to 9 clarify, Mr. Ballases.</p> <p>10 MR. BALLASES: I think it's very 11 clear. I mean, y'all are trying to coach her.</p> <p>12 MS. HOOD: No, it's not --</p> <p>13 MR. CHAUDHRI: We're not --</p> <p>14 MS. HOOD: We're not trying to coach 15 her. When she says "I don't know," I think she's 16 saying "I don't remember."</p> <p>17 MR. BALLASES: Okay.</p> <p>18 MS. HOOD: And she's confusing me. 19 Okay.</p> <p>20 So when he asked you a question, you 21 say "I don't know," is it because you don't know or you 22 don't remember?</p> <p>23 THE WITNESS: I don't know.</p> <p>24 MS. HOOD: You don't know?</p> <p>25 THE WITNESS: Yes.</p>	<p style="text-align: right;">Page 77</p> <p>1 A. I'm fine.</p> <p>2 Q. Good. We just took a short break. Are you 3 ready to get started?</p> <p>4 A. Sure.</p> <p>5 Q. Okay. I'm trying to find the bank statement 6 for you. Okay. Here we go.</p> <p>7 Okay. So when we left off, we were still 8 talking about Exhibit 27, which are Cadence Bank 9 statements for yourself and your son Ali Choudhri and 10 specifically there for Account No. 0076620.</p> <p>11 MR. CHAUDHRI: Object to form.</p> <p>12 MS. HOOD: Object to form.</p> <p>13 Q. (BY MR. BALLASES:) If you turn to the 14 statement dated January 22nd, 2021, within that set of 15 documents which you have in front of you, I want to 16 talk about a couple of deposits that were made.</p> <p>17 If you look down at the bottom of the page, 18 there is a deposit that was made on December 31st of 19 2020, and it was in the amount of 135,000 from "Harbor 20 Healthcare SYS, LP" and it references "Fall Creek Plaza 21 Settlement"; do you see that credit?</p> <p>22 MR. CHAUDHRI: Objection, form.</p> <p>23 A. Which one?</p> <p>24 Q. (BY MR. BALLASES:) The \$135,000 credit. Let 25 me see. There you go. A page over.</p>

<p style="text-align: right;">Page 78</p> <p>1 MR. CHOUHDRI: Objection, form.</p> <p>2 Q. (BY MR. BALLASES:) Okay. So first page of</p> <p>3 the bank statement that is January 22nd, 2021 in</p> <p>4 Exhibit 27, there shows a deposit that was made on</p> <p>5 December 31st in the amount of 135,000 from Harbor</p> <p>6 Healthcare and there's a reference of Fall Creek Plaza</p> <p>7 Settlement. Do you see that amount?</p> <p>8 MR. CHOUHDRI: Objection, form.</p> <p>9 A. Yes.</p> <p>10 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>11 Court why that \$135,000 deposit was made into this</p> <p>12 account?</p> <p>13 MR. CHOUHDRI: Objection, form.</p> <p>14 A. I don't remember.</p> <p>15 Q. (BY MR. BALLASES:) Okay. Do you -- okay.</p> <p>16 The next entry down is also on December 31st of 2020,</p> <p>17 but this one's for half-a-million dollars and it's from</p> <p>18 also "Harbor Healthcare" and it references the "Fall</p> <p>19 Creek Plaza Settlement." Do you know what that</p> <p>20 half-million-dollar deposit into this account pertain</p> <p>21 to?</p> <p>22 MR. CHOUHDRI: Objection, form.</p> <p>23 A. I don't know.</p> <p>24 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>25 next page of that statement. So the second page, still</p>	<p style="text-align: right;">Page 80</p> <p>1 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>2 Court from where that money originated?</p> <p>3 MR. CHOUHDRI: Objection, form.</p> <p>4 A. I don't remember.</p> <p>5 Q. (BY MR. BALLASES:) Okay. Then I see another</p> <p>6 entry, it's five days later, on May 10th of 2021 of</p> <p>7 \$850,000 and this one says it's from -- or at least it</p> <p>8 indicates -- it's from Al Choudhri. Do you know what</p> <p>9 that deposit pertained to?</p> <p>10 MR. CHOUHDRI: Objection, form.</p> <p>11 A. I don't know about it.</p> <p>12 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>13 next page of that same statement, so it's Page 2 of the</p> <p>14 May 20 of 2021 statement, it shows a couple of debits.</p> <p>15 One is in the amount of \$850,006 and it was made on May</p> <p>16 3rd of 2021. Do you know what that withdrawal pertain</p> <p>17 to?</p> <p>18 MR. CHOUHDRI: Objection, form.</p> <p>19 A. I don't know.</p> <p>20 Q. (BY MR. BALLASES:) Did you authorize that</p> <p>21 withdrawal?</p> <p>22 A. I don't know.</p> <p>23 Q. Okay.</p> <p>24 MR. CHOUHDRI: Objection, form.</p> <p>25 MS. HOOD: Again, I want to be clear.</p>
<p style="text-align: right;">Page 79</p> <p>1 on the January 22nd, 2021 statement, there is a debit</p> <p>2 to "Jetall Companies" made on January 14th of 2021 in</p> <p>3 the amount of \$31,000. Do you see that entry?</p> <p>4 A. Yes.</p> <p>5 MR. CHOUHDRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. Did you -- do you</p> <p>7 know what that entry pertain to?</p> <p>8 MR. CHOUHDRI: Objection, form.</p> <p>9 A. No, I don't remember.</p> <p>10 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>11 that transfer to Jetall Companies?</p> <p>12 MR. CHOUHDRI: Objection, form.</p> <p>13 A. I don't know about it.</p> <p>14 Q. (BY MR. BALLASES:) Okay. If we turn to the</p> <p>15 May 20th, 2021 statement, I can get it for you.</p> <p>16 Okay. So still on Exhibit 27, looking at the</p> <p>17 statement dated May, 20th of 2021, there are a couple</p> <p>18 of entries that I want to talk about with you.</p> <p>19 I'll give you a second to put your glasses</p> <p>20 on.</p> <p>21 Okay. On that particular statement, there is</p> <p>22 a deposit or credit made on May 5th of 2021 in the</p> <p>23 amount of \$850,000. Do you see that deposit?</p> <p>24 MR. CHOUHDRI: Objection, form.</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 81</p> <p>1 When you say you don't remember, is that the same thing</p> <p>2 as "I don't know," because you need to be clear for the</p> <p>3 man to answer his questions.</p> <p>4 MR. BALLASES: Did she say "I don't</p> <p>5 know"?</p> <p>6 THE REPORTER: "I don't know" is what</p> <p>7 I have.</p> <p>8 MR. BALLASES: Yeah, that's what</p> <p>9 I thought.</p> <p>10 MS. HOOD: Okay. But do you not</p> <p>11 remember or do you not know? I'm just trying to make</p> <p>12 the record clear.</p> <p>13 THE WITNESS: Okay.</p> <p>14 MS. HOOD: All right.</p> <p>15 Q. (BY MR. BALLASES:) Okay. So shortly a little</p> <p>16 bit further down on that same page on May 5th of 2021,</p> <p>17 it shows an \$850,000 debit going to "Stewart Title</p> <p>18 Guaranty Company." Do you know what that money was</p> <p>19 sent for?</p> <p>20 MR. CHOUHDRI: Objection, form.</p> <p>21 A. I don't remember.</p> <p>22 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>23 that money to be sent?</p> <p>24 MR. CHOUHDRI: Objection, form.</p> <p>25 A. I don't remember.</p>

<p style="text-align: right;">Page 82</p> <p>1 Q. (BY MR. BALLASES:) Okay. In 2021, when this 2 statement was made, you weren't working anymore, right? 3 MR. CHAUDHRI: Objection, form. 4 A. No. 5 Q. (BY MR. BALLASES:) You weren't working? 6 A. I don't remember. I know I don't -- I didn't 7 work. 8 Q. Yeah. Okay. 9 (Reporter clarification.) 10 MR. CHAUDHRI: For clarification, your 11 answer was, "I don't remember"? Is that correct? 12 THE WITNESS: Yes. 13 (Brief interruption.) 14 MS. HOOD: Sorry. 15 Q. (BY MR. BALLASES:) Okay. If you could turn 16 to the bank statement that is June 22nd of 2021, of 17 that same Exhibit 27. Okay. So still looking at 18 Exhibit 27, which is a Cadence Bank statement, Account 19 No. 0076620 for Shahnaz Choudhri and Ali Choudhri, and 20 turning specifically in that exhibit to the statement 21 dated June 22nd of 2021. 22 The question I have for you is, on that page 23 or on that bank statement on June 3rd there is a -- 24 June 3rd of 2021, there is a \$870,000 deposit into this 25 account. Can you tell the Court what that specific</p>	<p style="text-align: right;">Page 84</p> <p>1 Batch is? 2 MR. CHAUDHRI: Objection, form. 3 A. I don't know about it. I don't remember this 4 statement. 5 Q. (BY MR. BALLASES:) Okay. So you have no 6 knowledge of what Oasis Batch pertains to? 7 MR. CHAUDHRI: Objection, form. 8 MS. HOOD: Object to form. That 9 wasn't her answer. She said she doesn't remember. 10 MR. BALLASES: Okay. 11 MS. HOOD: Which is different. 12 Q. (BY MR. BALLASES:) Do you have any knowledge 13 as to what Oasis Batch pertains to? 14 MR. CHAUDHRI: Objection, form. 15 MS. HOOD: Objection. You've asked 16 the question. She's answered it. And now you're 17 trying to put words in her mouth. 18 A. I don't know. I don't remember. 19 Q. (BY MR. BALLASES:) Okay. If you turn to the 20 second page of that bank statement, which is a June 21 20th, 2021 bank statement, there is a debit in the 22 amount of \$172,046.49 that was made on June 17th of 23 2021 and paid to "CCI Holdings, LLC" and there's a 24 reference to "Shepherd Huldy" on that entry. Do you 25 see that?</p>
<p style="text-align: right;">Page 83</p> <p>1 deposit pertained to? 2 MR. CHAUDHRI: Objection, form. 3 A. I don't remember. 4 Q. (BY MR. BALLASES:) Do you know where it 5 originated from? 6 A. I don't remember. 7 MR. CHAUDHRI: Objection, form. 8 Q. (BY MR. BALLASES:) Okay. I see -- and we've 9 talked about this a little bit because I've seen these 10 on other bank statements, but on that same bank 11 statement there's "Oasis Batch, Payroll"; do you see 12 that entry? 13 MR. CHAUDHRI: Objection, form. 14 Q. (BY MR. BALLASES:) See, "Oasis Batch, 15 Payroll" and "Oasis Batch, Payroll." It's on there 16 twice. 17 MR. CHAUDHRI: Objection, form. 18 Q. (BY MR. BALLASES:) Do you see that? 19 A. Yes. 20 MR. CHAUDHRI: Objection, form. 21 Q. (BY MR. BALLASES:) Okay. So can you tell the 22 Court what those deposits pertain to? 23 MR. CHAUDHRI: Objection, form. 24 A. I don't remember. 25 Q. (BY MR. BALLASES:) Do you know what Oasis</p>	<p style="text-align: right;">Page 85</p> <p>1 MR. CHAUDHRI: Objection, form. 2 A. Yes. 3 Q. (BY MR. BALLASES:) Okay. Can you tell the 4 Court what this payment was for? 5 MR. CHAUDHRI: Objection, form. 6 A. I don't know. I don't remember it at all. 7 Q. (BY MR. BALLASES:) Okay. You had no 8 involvement with any entity known as Shepherd-Huldy? 9 MR. CHAUDHRI: Objection, form. 10 A. I don't remember. 11 Q. (BY MR. BALLASES:) Yeah. Okay. If you could 12 turn -- staying within Exhibit 27, if you could turn to 13 the bank statement that is dated November 19th, 2021. 14 Here you go. 15 Okay. This particular bank statement in 16 Exhibit 27 shows a deposit that was made on November, 17 12th, 2021 in the amount of \$9,483,411.74 from 18 "Transact Title" and it shows an entry of "Seller 19 Proceeds 1708 River O" is what it says. Do you see 20 that? 21 MR. CHAUDHRI: Objection, form. 22 A. Yes. 23 Q. (BY MR. BALLASES:) Okay. Can you tell the 24 Court where this money originated from? 25 MR. CHAUDHRI: Objection, form.</p>

<p style="text-align: right;">Page 86</p> <p>1 A. I don't remember at all.</p> <p>2 Q. (BY MR. BALLASES:) Okay. Could we turn to</p> <p>3 the -- in the Exhibit 27, the statement dated December</p> <p>4 20th of 2021, so the next statement over. Here you go.</p> <p>5 Okay. The statement dated December 20th of</p> <p>6 2021 in Exhibit 27, shows a deposit on December 14th of</p> <p>7 2021 of \$7 million from "Transact Title" and it says</p> <p>8 "Returning Buyer Funds." Do you see that?</p> <p>9 A. Yes.</p> <p>10 MR. CHAUDHRI: Objection, form.</p> <p>11 Q. (BY MR. BALLASES:) Can you tell the Court</p> <p>12 what that deposit pertained to?</p> <p>13 MR. CHAUDHRI: Objection, form.</p> <p>14 A. I don't remember.</p> <p>15 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>16 second page of that same December 20th, 2021 bank</p> <p>17 statement, there is a debit that was made on December</p> <p>18 15th of 2021 of \$3,584,669.23 that went to</p> <p>19 "Independence Title," and there's a GF number noted.</p> <p>20 Do you see that?</p> <p>21 MR. CHAUDHRI: Objection, form.</p> <p>22 A. Yes.</p> <p>23 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>24 Court what that payment was made for?</p> <p>25 MR. CHAUDHRI: Objection, form.</p>	<p style="text-align: right;">Page 88</p> <p>1 A. I don't remember at all.</p> <p>2 Q. (BY MR. BALLASES:) Okay. If we turn to the</p> <p>3 May 19, 2022 statement. Here we go. I'm going to tab</p> <p>4 this one just so in case it flips over, we know where</p> <p>5 we were. Okay.</p> <p>6 So within Exhibit 27, looking at the</p> <p>7 statement dated May 19th of 2022, there is a deposit</p> <p>8 and other credit of \$1 million that was made into this</p> <p>9 account on April 21st of 2022. Do you see that?</p> <p>10 MR. CHAUDHRI: Objection, form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>13 Court from where that money originated?</p> <p>14 MR. CHAUDHRI: Objection, form.</p> <p>15 A. I don't remember.</p> <p>16 Q. (BY MR. BALLASES:) Okay. There is also a</p> <p>17 credit or deposit made on May 18th of 2022 on that bank</p> <p>18 statement in the amount of \$150,000 from "Benjamin</p> <p>19 Gubernick." Do you recall or do you know what that</p> <p>20 deposit pertained to?</p> <p>21 MR. CHAUDHRI: Objection, form.</p> <p>22 A. I don't remember.</p> <p>23 Q. (BY MR. BALLASES:) Okay. If you look at</p> <p>24 the -- a little bit further down that page, there was a</p> <p>25 debit or a transfer or payment that was made on April</p>
<p style="text-align: right;">Page 87</p> <p>1 A. I don't remember at all.</p> <p>2 Q. (BY MR. BALLASES:) Okay. On that same date,</p> <p>3 December 15th of 2021, there was also a \$5,029,527.91</p> <p>4 payment or transfer to "Capital Title of Texas, LLC";</p> <p>5 do you see that?</p> <p>6 A. Yes.</p> <p>7 MR. CHAUDHRI: Objection, form.</p> <p>8 Q. (BY MR. BALLASES:) Can you tell the Judge why</p> <p>9 that transfer of funds was made?</p> <p>10 MR. CHAUDHRI: Objection, form.</p> <p>11 A. I don't remember.</p> <p>12 Q. (BY MR. BALLASES:) Okay. If we turn to the</p> <p>13 January 21st, 2022 bank statement, next one over.</p> <p>14 There you go.</p> <p>15 Okay. On this page, still looking at Exhibit</p> <p>16 27, this is a statement dated January 21st, 2022.</p> <p>17 There is a deposit of that same number we just talked</p> <p>18 about. It was made on December 21st of '22. It's</p> <p>19 \$5,029,527.91 from Capital Title of Texas, LLC"; do you</p> <p>20 see that?</p> <p>21 A. Yes.</p> <p>22 MR. CHAUDHRI: Objection, form.</p> <p>23 Q. (BY MR. BALLASES:) Can you tell the Court why</p> <p>24 that money is now coming into the account?</p> <p>25 MR. CHAUDHRI: Objection, form.</p>	<p style="text-align: right;">Page 89</p> <p>1 21st of 2022 in the amount of half a million dollars</p> <p>2 for "Benchmark Title, LLC" and it references "Buyer</p> <p>3 Meandering Bend" and has a GF number. Do you see that?</p> <p>4 A. Yes.</p> <p>5 MR. CHAUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. Do you know what</p> <p>7 that half-a-million-dollar payment related to?</p> <p>8 MR. CHAUDHRI: Objection, form.</p> <p>9 A. I don't remember.</p> <p>10 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>11 that payment to be made?</p> <p>12 MR. CHAUDHRI: Objection, form.</p> <p>13 A. No. I don't remember.</p> <p>14 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>15 next page of that statement, Page 2 of that statement,</p> <p>16 still on the May 19th, 2022 date, there is a debit or a</p> <p>17 payment that was made on April 25th of 2022. It was a</p> <p>18 half million dollars to "Austin San Gabriel Corner,</p> <p>19 LLC" and it has a GF number. Do you see that entry?</p> <p>20 A. Yes.</p> <p>21 MR. CHAUDHRI: Objection, form.</p> <p>22 Q. (BY MR. BALLASES:) Okay. Do you know what</p> <p>23 that payment was made for?</p> <p>24 MR. CHAUDHRI: Objection, form.</p> <p>25 A. I don't know. I don't know.</p>

Page 90		Page 92	
1	Q. (BY MR. BALLASES:) Okay. Did you authorize	1	MR. CHAUDHRI: Objection, form.
2	that payment?	2	A. I don't know.
3	MR. CHAUDHRI: Objection, form.	3	Q. (BY MR. BALLASES:) Okay. And have you -- let
4	A. I don't remember.	4	me ask you this, have you ever had to hire Jennifer
5	Q. (BY MR. BALLASES:) Okay. If we turn to the	5	MacGeorge for any legal work?
6	June 21st statement, which is two -- there you go.	6	MR. CHAUDHRI: Objection, form.
7	So looking at Exhibit 27, still looking at	7	A. I don't know.
8	the now June 21st, 2022 bank statement, there is a	8	Q. (BY MR. BALLASES:) Okay. If you look a
9	credit or deposit of \$200,000 from "The Fit Foods LL"	9	little bit further down on that same bank statement,
10	that was made on May 31st of 2022. Do you see that?	10	the July 22nd, 2022 bank statement, it shows a payment
11	A. Yes.	11	or a debit or a transfer on July 18th of 2022 of
12	MR. CHAUDHRI: Objection, form.	12	\$160,000 to "JLM Law, PLLC, Jennifer MacGeorge." Do
13	Q. (BY MR. BALLASES:) Okay. Do you have a	13	you see that entry?
14	recollection of why that deposit was made?	14	A. Yes.
15	A. I don't remember.	15	MR. CHAUDHRI: Objection, form.
16	MR. CHAUDHRI: Objection, form.	16	Q. (BY MR. BALLASES:) Do you know what that
17	Q. (BY MR. BALLASES:) Okay. There are three	17	payment was related to?
18	other deposits that were made in the -- over the next	18	A. I don't know.
19	few days, June 1st, June 2nd and June 3rd for different	19	MR. CHAUDHRI: Objection, form.
20	amounts that are reflected on this particular bank	20	Q. (BY MR. BALLASES:) Did you authorize that
21	statement that's dated June 21st, 2022.	21	payment to be made?
22	MR. CHAUDHRI: Objection, form.	22	A. I don't know.
23	Q. (BY MR. BALLASES:) Do you have -- do you know	23	MR. CHAUDHRI: Objection, form.
24	at all -- can you tell the Court why those deposits	24	Q. (BY MR. BALLASES:) Okay. If you turn to the
25	were made?	25	second page of that statement. Okay. On that same
Page 91		Page 93	
1	MR. CHAUDHRI: Objection, form.	1	bank statement dated July 22nd, 2022, there is a debit
2	A. I don't know at all.	2	or a payment or transfer of -- you got it -- that was
3	Q. (BY MR. BALLASES:) Okay. Does The Fit Foods,	3	made on July 19th of 2022 and it shows a \$300,000
4	does that ring a bell to you at all? Do you have any	4	payment or transfer to "Veritex Community Bank Loan
5	recollection?	5	OPS" and it says -- there's a reference that says "to
6	A. Yes. I don't remember.	6	further credit loan in the name of BDFI, LLC." Do you
7	MR. CHAUDHRI: Objection, form.	7	see that?
8	Q. (BY MR. BALLASES:) Okay. Can you turn to the	8	MR. CHAUDHRI: Objection, form.
9	July 22nd -- there you go.	9	A. Yes.
10	If you look at the -- on Exhibit 27, the bank	10	Q. (BY MR. BALLASES:) Okay. Do you know what
11	statement that is July 22nd, 2022, there is a deposit	11	that \$300,000 transfer related to?
12	or credit that was made on June 24th of '22 in the	12	MR. CHAUDHRI: Objection, form.
13	amount of \$365,525.66 from "Hudson Title Group, LLC"	13	A. I don't -- I don't recognize this.
14	and it says "Seller Proceeds Ali" and it says	14	Q. (BY MR. BALLASES:) Okay. BDFI, LLC, do you
15	"C-H-O-U-D-H"; do you see that?	15	recognize that?
16	MR. CHAUDHRI: Objection, form.	16	MR. CHAUDHRI: Objection, form.
17	A. Which one is?	17	A. No.
18	Q. (BY MR. BALLASES:) Go one over. There you	18	Q. (BY MR. BALLASES:) Okay. And if you see on
19	go. 365. "Hudson Title Group." It says "Seller	19	that same date on that same statement on July 19th,
20	Proceeds Ali" and then it says "C-H-O-U-D-H." Do you	20	2022, there was also a \$300,000 checking withdrawal.
21	see that?	21	Do you know who withdrew that money, that \$300,000
22	A. Yes.	22	money?
23	MR. CHAUDHRI: Objection, form.	23	MR. CHAUDHRI: Objection, form.
24	Q. (BY MR. BALLASES:) Okay. Do you know what	24	MS. HOOD: Object to form.
25	this deposit pertained to?	25	A. I don't remember.

<p style="text-align: right;">Page 94</p> <p>1 Q. (BY MR. BALLASES:) Okay. If you turn to the 2 second page of the bank statement that is dated August 3 22nd of 2022. I can help you here. Okay. Here is the 4 second page, August 22nd, 2022.</p> <p>5 Okay. Still within Exhibit 27 and looking at 6 the bank statement dated August 22nd, 2022 and 7 specifically on the second page of that bank statement, 8 there are several debits that I wanted to ask about.</p> <p>9 The first one is dated July 29th of 2022 and 10 it's a \$200,000 payment to Hanif Jhaveri. And I'll 11 spell it. It's J-H-A-V-E-R-I. Do you have a 12 recollection of why this transfer was made to Hanif?</p> <p>13 MR. CHAUDHRI: Objection, form.</p> <p>14 MS. HOOD: Objection, form.</p> <p>15 A. I don't know. I don't remember at all.</p> <p>16 Q. (BY MR. BALLASES:) Okay. You didn't ever 17 have to hire -- did you ever hire Anthony Buzbee, Tony 18 Buzbee, for any legal work?</p> <p>19 MR. CHAUDHRI: Objection, form.</p> <p>20 A. I don't know.</p> <p>21 Q. (BY MR. BALLASES:) Okay. So this -- a little 22 bit further down on that same page on August 1st, 2022, 23 there's a \$50,000 payment to "Anthony G. Buzbee, LP." 24 Do you know what that \$50,000 related to?</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 96</p> <p>1 made on September 20th of 2022 for \$2.8 million and it 2 says "Ali Choudhri." Do you see that?</p> <p>3 MR. CHAUDHRI: Objection, form.</p> <p>4 A. Yes.</p> <p>5 Q. (BY MR. BALLASES:) Okay. Can you tell the 6 Court from where that money originated or why it was 7 deposited in this account?</p> <p>8 MR. CHAUDHRI: Objection, form.</p> <p>9 A. I don't recognize.</p> <p>10 Q. (BY MR. BALLASES:) Okay. If you turn to the 11 next page, the second page of that same September 22nd, 12 2022 statement, I see -- and we're looking at the 13 debits now. And I see there is a entry on August 24th 14 of 2022 in the amount of \$97,086 to A-V-I, R-E-D-D-Y, 15 Avi Reddy, and it says "Loan payoff." Do you see that?</p> <p>16 MR. CHAUDHRI: Objection, form.</p> <p>17 A. Yes.</p> <p>18 Q. (BY MR. BALLASES:) Okay. Can you tell the 19 Court what that payment pertained to?</p> <p>20 MS. HOOD: Object to form.</p> <p>21 A. I don't know.</p> <p>22 Q. (BY MR. BALLASES:) Okay.</p> <p>23 MR. CHAUDHRI: Objection, form.</p> <p>24 MS. HOOD: Again, is it you don't know 25 or you don't remember? I want the record to be clear.</p>
<p style="text-align: right;">Page 95</p> <p>1 MR. CHAUDHRI: Objection, form.</p> <p>2 Q. (BY MR. BALLASES:) Okay. Also on that same 3 page on August 4th of 2022, there's a \$50,000 payment 4 to Jesse Mamuhewa. And I'll spell it. It's 5 M-A-M-U-H-E-W-A. Do you know what that \$50,000 payment 6 relates to?</p> <p>7 MR. CHAUDHRI: Objection, form.</p> <p>8 A. I don't -- I don't recognize this.</p> <p>9 Q. (BY MR. BALLASES:) Okay. And the last entry 10 I want to talk about on that page is on August 19th of 11 2022. It's a \$400,000 payment or transfer to "Romspen 12 US Master Mortgage LP" and there's a note that says 13 "Loan Extension." Do you see that?</p> <p>14 A. Yes.</p> <p>15 MR. CHAUDHRI: Objection, form.</p> <p>16 Q. (BY MR. BALLASES:) Do you know what that 17 \$400,000 payment was made for?</p> <p>18 A. I can't recognize this.</p> <p>19 Q. (BY MR. BALLASES:) Okay. If we could turn to 20 the September 22nd, 2022 bank statement. I'll help 21 you.</p> <p>22 MR. CHAUDHRI: Objection, form.</p> <p>23 Q. (BY MR. BALLASES:) Okay. Looking at the 24 first page of the September 22nd, 2022 bank statement 25 and within Exhibit 27, there is a credit or deposit</p>	<p style="text-align: right;">Page 97</p> <p>1 Q. (BY MR. BALLASES:) Do you have any knowledge 2 of why \$97,000- --</p> <p>3 MS. HOOD: Let me finish.</p> <p>4 Ms. Choudhri, --</p> <p>5 MR. BALLASES: It's not your 6 deposition. I'm letting you do this.</p> <p>7 MS. HOOD: Okay. Thank you.</p> <p>8 MR. BALLASES: You're welcome.</p> <p>9 MS. HOOD: Bless your heart. Aren't 10 you sweet?</p> <p>11 MR. BALLASES: I appreciate it. I am.</p> <p>12 MS. HOOD: No, you're not.</p> <p>13 For the record, --</p> <p>14 THE WITNESS: Yes. I don't remember.</p> <p>15 MS. HOOD: Okay. Thank you.</p> <p>16 Q. (BY MR. BALLASES:) Okay. So do you ever 17 remember hiring an attorney Manfred Steinberg?</p> <p>18 A. Not at all.</p> <p>19 Q. (BY MR. BALLASES:) Okay. What about an 20 attorney Steve Roberts? Did you ever hire --</p> <p>21 A. I don't know.</p> <p>22 Q. Okay. So there's a \$10,000 payment made to 23 Manfred Steinberg on August 29th, 2022. Do you have --</p> <p>24 do you have any knowledge of that?</p> <p>25 A. No, I don't.</p>

<p style="text-align: right;">Page 98</p> <p>1 Q. Okay. There's also on August 29th, \$25,000 2 payment or transfer made to "Steven A Roberts PC." It 3 says "Legal Fees." Do you have any knowledge of that? 4 MS. HOOD: Object to form. 5 A. No, I don't remember. 6 Q. (BY MR. BALLASES:) Okay. Also on August 7 29th, 2022 there is a \$1 million checking -- there's a 8 \$1 million withdrawal. Do you know about that 9 particular withdrawal? 10 MS. HOOD: Object to form. 11 MR. CHAUDHRI: Objection, form. 12 A. I don't remember. 13 Q. (BY MR. BALLASES:) Okay. If we turn on to -- 14 let me see -- two pages further. Hold -- let's put a 15 tab on this page. We're going to come back to it. But 16 if we turn just a little bit further. 17 There's some checks there associated with 18 this bank statement and it shows the million-dollar 19 withdrawal that's referenced that we just discussed. 20 And it says that you made the withdrawal in the amount 21 of a million dollars. Do you see that? 22 MR. CHAUDHRI: Objection, form. 23 A. Yes. 24 Q. (BY MR. BALLASES:) Okay. Is that your 25 signature on the withdrawal slip?</p>	<p style="text-align: right;">Page 100</p> <p>1 amount of \$50,010. And the other one is in the amount 2 of \$2 million. Do you see that? 3 MR. CHAUDHRI: Objection, form. 4 A. Yes. 5 Q. (BY MR. BALLASES:) Do you know what those two 6 withdrawals pertain to? 7 A. I don't remember. 8 MR. CHAUDHRI: Objection, form. 9 Q. (BY MR. BALLASES:) Okay. And if we turn back 10 two pages forward to the check page, we can see that 11 those two withdrawals -- I got this page. Yup. There 12 you go. 13 Okay. So we look at this particular page of 14 this statement, it shows the \$2 million withdrawal and 15 the \$50,000 withdrawal were made by -- by you. Do you 16 see that? 17 MR. CHAUDHRI: Objection, form. 18 A. Yes. 19 Q. (BY MR. BALLASES:) Does that jog your memory 20 about what those pertain to? 21 MR. CHAUDHRI: Objection, form. 22 A. No, I don't know. 23 MR. CHAUDHRI: Objection, form. 24 Q. (BY MR. BALLASES:) Okay. Do you know what 25 happened with that money?</p>
<p style="text-align: right;">Page 99</p> <p>1 MR. CHAUDHRI: Objection, form. 2 MS. HOOD: Object to form. 3 A. I don't remember. 4 Q. (BY MR. BALLASES:) Okay. And then if we turn 5 back to this page. If we look a little bit further 6 down that page on August 31st, 2022, there is 7 \$150,000 -- sorry. There's a \$150,000 debit on August 8 31st, 2022 to "Romspeen." It says "Mortgage Payment." 9 Do you have any recollection of why that 10 payment was made? 11 MR. CHAUDHRI: Objection, form. 12 A. I don't know about it. 13 Q. (BY MR. BALLASES:) Okay. And then if we go a 14 little bit further down that same page, there's a 15 \$150,000 transfer made on September 16th to "Akin Gump 16 Strauss Hauer & Feld." Do you know what that transfer 17 of funds was about? 18 MR. CHAUDHRI: Objection, form. 19 MS. HOOD: Objection, form. 20 A. I don't know. 21 Q. (BY MR. BALLASES:) Okay. 22 MR. CHAUDHRI: Asked and answered. 23 Q. (BY MR. BALLASES:) And then if we look a 24 little bit further on the page, there's on September 25 20th, 2022, there are two withdrawals. One is in the</p>	<p style="text-align: right;">Page 101</p> <p>1 MR. CHAUDHRI: Objection, form. 2 A. I don't remember. 3 Q. (BY MR. BALLASES:) Okay. If we turn to -- 4 we're done with this one. 5 MS. HOOD: Thank God. 6 MR. BALLASES: I know. It was too 7 long. 8 THE WITNESS: You don't need it? 9 MR. BALLASES: No, we don't need that 10 right now. You can move it right here. We might need 11 it later, but I don't think we do right now. 12 Okay. We're on 30, right? Yeah, 30 13 is the next one. 14 (Exhibit No. 30 marked.) 15 Q. (BY MR. BALLASES:) Okay. Handing you now 16 what is marked 30 to your deposition. You-all can 17 decide who gets it. Okay. Exhibit 30 to your 18 deposition is a Frost Bank statement that is in the 19 name of yourself and Mobeen Naeem Choudhri. Do you see 20 that? 21 MR. CHAUDHRI: Objection, form. 22 A. Yes. 23 Q. (BY MR. BALLASES:) Okay. And you told us in 24 your last deposition Mobeen Naeem Choudhri; that is 25 your daughter, correct?</p>

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1	MR. CHAUDHRI: Objection, form.	1	just referenced in Exhibit 30. It says the account
2	A. Yes.	2	holders are "Mobeen Naeem Choudhri or Shahnaz Akhter
3	Q. (BY MR. BALLASES:) Okay.	3	Choudhri." Do you see that?
4	MR. CHAUDHRI: Mr. Ballases, is this a	4	MR. CHAUDHRI: Object to form.
5	continuation of the deposition?	5	MS. HOOD: Object to form.
6	MR. BALLASES: Sure.	6	Q. (BY MR. BALLASES:) Okay. And it's for the
7	Q. (BY MR. BALLASES:) And so this particular --	7	same Account No., which is 100686328. Do you see that?
8	this particular account at Frost Bank is in the name	8	MR. CHAUDHRI: Objection, form.
9	of -- strike that.	9	MS. HOOD: Object to form.
10	Is for Account No. 100686328. Do you see	10	Q. (BY MR. BALLASES:) Okay. And the date of
11	that?	11	this Account Selection Form Notice is November 19th,
12	A. Yes.	12	2020. Do you see that?
13	MR. CHAUDHRI: Objection, form.	13	A. Yes.
14	Q. (BY MR. BALLASES:) Okay. And it says that	14	MR. CHAUDHRI: Objection, form.
15	this particular account was opened on November 14th,	15	Q. (BY MR. BALLASES:) Okay. And it indicates
16	2017. Do you see that?	16	that it is a "Multi-Party Account With Right of
17	A. Yes.	17	Survivorship" under No. 4? Do you see that on the
18	MR. CHAUDHRI: Objection, form.	18	first page?
19	Q. (BY MR. BALLASES:) Okay. And then it notes	19	MR. CHAUDHRI: Objection, form.
20	under -- if you go a little bit further down the page	20	Objection, form.
21	under "Signer 2," it's got your name, "Shahnaz" -- and	21	Q. (BY MR. BALLASES:) Right there.
22	I'm going to -- can you tell me how to pronounce	22	A. Okay.
23	your -- your maiden name?	23	Q. Okay. And do you recognize those initials?
24	A. Shahnaz Akhter Choudhri.	24	MR. CHAUDHRI: Objection, form.
25	Q. (BY MR. BALLASES:) Akhter. Okay. Shahnaz	25	A. I don't remember.
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1	Akhter Choudhri. And it says -- it says "Employer," it	1	Q. (BY MR. BALLASES:) Okay. If you turn to the
2	says "Jetalli Company," but then it says "Occupation	2	second page of that exhibit.
3	Retired." Do you see that?	3	MR. CHAUDHRI: Objection, form.
4	MR. CHAUDHRI: Objection, form.	4	Q. (BY MR. BALLASES:) It's signed by -- it says
5	A. Yes.	5	"Mobeen Naeem Choudhri and Shahnaz Akhter Choudhri."
6	Q. (BY MR. BALLASES:) Okay. So this is a bank	6	Do you see that?
7	account that is for you and your daughter only; is that	7	A. Yes.
8	right?	8	MR. CHAUDHRI: Object to form.
9	MR. CHAUDHRI: Objection, form.	9	MS. HOOD: Object to form.
10	A. I don't remember.	10	Q. (BY MR. BALLASES:) Okay. I'm now going to
11	Q. (BY MR. BALLASES:) Well, I mean, the account	11	hand you what is marked Exhibit 32 to your deposition.
12	is only in the name of Mobeen Naeem Choudhri and	12	Here you go. This is a new exhibit.
13	yourself, right?	13	(Exhibit No. 32 marked.)
14	A. Yes.	14	MR. CHAUDHRI: Objection, form.
15	MR. CHAUDHRI: Objection, form.	15	Q. (BY MR. BALLASES:) Okay. So if you look at
16	MS. HOOD: Object to form.	16	Exhibit 32 to your deposition, these are transfers,
17	Q. (BY MR. BALLASES:) Okay. I'm now going to	17	wire transfers, to and from the same account we just
18	hand you Exhibit 31 to your deposition. This is a new	18	looked at.
19	exhibit.	19	MR. CHAUDHRI: Objection, form.
20	(Exhibit No. 31 marked.)	20	MS. HOOD: Objection, form.
21	MR. BALLASES: Here you go.	21	Q. (BY MR. BALLASES:) Do you recognize that?
22	There you go for y'all.	22	MR. CHAUDHRI: Objection, form.
23	Q. (BY MR. BALLASES:) Okay. Okay. Exhibit 31	23	MS. HOOD: Objection, form.
24	to your deposition is just a -- looks like it's a	24	A. No.
25	"Account Select Form Notice" for the same account we	25	Q. (BY MR. BALLASES:) Okay. If you look at the

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1 top left-hand corner, it's got the Account No.	1 well, strike that.
2 100686328. Do you see that?	2 Do you know what Caz Creek Holdings, LLC is?
3 A. Yes.	3 MR. CHAUDHRI: Objection, form.
4 MR. CHAUDHRI: Objection, form.	4 MS. HOOD: Object to form.
5 MS. HOOD: Object to form.	5 A. I don't remember.
6 Q. (BY MR. BALLASES:) Okay. And that's the same	6 Q. (BY MR. BALLASES:) Have you ever done
7 account number that we looked at for the last two	7 business with Caz Creek Holdings, LLC?
8 exhibits, --	8 MS. HOOD: Object to form.
9 MR. CHAUDHRI: Objection, form.	9 MR. CHAUDHRI: Objection, form.
10 MS. HOOD: Object to form.	10 A. I don't remember.
11 Q. (BY MR. BALLASES:) -- right?	11 Q. (BY MR. BALLASES:) Okay. Can you tell the
12 The same two account numbers that we have	12 Court why this \$869,000 went from your account to Caz
13 there and there?	13 Creek Holdings, LLC?
14 MR. CHAUDHRI: Objection, form.	14 MR. CHAUDHRI: Objection, form.
15 MS. HOOD: Objection, form.	15 A. Yes. I don't remember, I don't.
16 Q. (BY MR. BALLASES:) Okay. So I want to ask	16 MS. HOOD: Objection, form.
17 you about some of these transfers. If you look at the	17 Q. (BY MR. BALLASES:) Okay. Did you authorize
18 first page of Exhibit 32, there is a transfer in the	18 this transfer to be made from your account to Caz Creek
19 amount of \$869,000 from your account here at Frost	19 Holdings?
20 Bank. It says "Originator" right down there. It says	20 A. I don't remember.
21 "Originator" is "Mobeen Naeem Choudhri or Shahnaz Akhter	21 MR. CHAUDHRI: Objection, form.
22 Choudhri."	22 MS. HOOD: Object to form.
23 MR. CHAUDHRI: Objection, form.	23 Q. (BY MR. BALLASES:) Okay. And you can see the
24 MS. HOOD: Object to form.	24 send date on that at the top is -- it looks like August
25 A. This one?	25 24th of 2021?
Page 107	Page 109
1 Q. (BY MR. BALLASES:) Yeah.	1 MR. CHAUDHRI: Objection, form.
2 MR. CHAUDHRI: Objection, form.	2 MS. HOOD: Same objection.
3 MS. HOOD: Is there a question?	3 MR. BALLASES: Okay.
4 MR. BALLASES: Yes.	4 MS. HOOD: We're at 40 minutes.
5 MS. HOOD: Because I can't tell who's	5 MR. BALLASES: Do you want to take a
6 testifying; you or her?	6 break?
7 MR. BALLASES: Yeah. Okay.	7 MS. HOOD: Yes.
8 MR. CHAUDHRI: Mr. Ballases, please	8 MR. BALLASES: Okay.
9 stop testifying.	9 THE VIDEOGRAPHER: Off the record at
10 Q. (BY MR. BALLASES:) Do you see the	10 1:50.
11 beneficiary?	11 (Off the record.)
12 A. Yes.	12 THE VIDEOGRAPHER: We are back on the
13 MR. CHAUDHRI: Objection, form.	13 record at 2:11.
14 Q. (BY MR. BALLASES:) And the beneficiary is	14 Q. (BY MR. BALLASES:) Ms. Choudhri, we're back
15 "Caz Creek Holdings, LLC"; do you see that?	15 from a short break. Are you ready to get started?
16 MS. HOOD: Object to form.	16 A. Yes, please.
17 MR. CHAUDHRI: Objection, form.	17 Q. Okay. Still looking at Exhibit 32 to your
18 A. Yes.	18 deposition.
19 Q. (BY MR. BALLASES:) Okay. Can you -- and if	19 A. Uh-huh.
20 you go down a little bit further where it says "Bank to	20 Q. I'd like to turn to the page that is dated --
21 Bank Info: Purpose: Business Distribution"; do you	21 has a send date at the top of November 22nd, 2022.
22 see that?	22 MS. HOOD: Object to form.
23 A. Yes.	23 Q. (BY MR. BALLASES:) I can get to it for you.
24 MS. HOOD: Object to form.	24 Okay. So looking at Exhibit 32 and looking
25 Q. (BY MR. BALLASES:) Okay. Can you tell --	25 at the wire statement that's got the send date of

<p style="text-align: right;">Page 110</p> <p>1 November 22nd, 2022, do you see -- well, do you see 2 that page, first of all?</p> <p>3 A. Yes.</p> <p>4 MS. HOOD: Object to form.</p> <p>5 Q. (BY MR. BALLASES:) Okay. On this particular 6 page, it shows that a wire was made from this account 7 where it says "Originator"; do you see that?</p> <p>8 A. Yes.</p> <p>9 MS. HOOD: Object to form.</p> <p>10 Q. (BY MR. BALLASES:) Okay. And do you see a 11 little above that, it says the "Beneficiary"?</p> <p>12 MS. HOOD: Object to form.</p> <p>13 A. Yes.</p> <p>14 Q. (BY MR. BALLASES:) Okay. And it shows the 15 "Beneficiary" as "Cazenovia Creek Funding II LLC"; do 16 you see that?</p> <p>17 MS. HOOD: Object to form.</p> <p>18 A. Yes.</p> <p>19 Q. (BY MR. BALLASES:) Okay. You have not done 20 any business with Cazenovia Creek Funding II, LLC, have 21 you?</p> <p>22 MS. HOOD: Object to form.</p> <p>23 A. No.</p> <p>24 Q. (BY MR. BALLASES:) Okay. And the amount of 25 that wire transfer from this account to Cazenovia is</p>	<p style="text-align: right;">Page 112</p> <p>1 Q. Okay. Do you see the wire out send date 2 statement that's dated January 30th of 2023?</p> <p>3 MS. HOOD: Object to form.</p> <p>4 A. Where is it?</p> <p>5 Q. (BY MR. BALLASES:) Right there.</p> <p>6 A. Okay.</p> <p>7 Q. Okay. So this particular statement shows 8 that the originator, if you go down to the bottom where 9 it says "Originator," is your account, "Mobeen Naeem 10 Choudhri or Shahnaz Akhter Choudhri"; do you see that?</p> <p>11 A. Yes.</p> <p>12 MS. HOOD: Object to form.</p> <p>13 Q. (BY MR. BALLASES:) Okay. And the 14 "Beneficiary" is "Heritage Title Company of Austin"; do 15 you see that?</p> <p>16 A. Yes.</p> <p>17 MS. HOOD: Object to form.</p> <p>18 Q. (BY MR. BALLASES:) Okay. And if you look 19 down a little bit further at the bottom, it says, "Bank 20 to Bank Info: Purchase for business"; do you see that?</p> <p>21 MS. HOOD: Object to form.</p> <p>22 A. I don't remember.</p> <p>23 Q. (BY MR. BALLASES:) So right down here it 24 says, "Bank to Bank Info" and it says "Purchase for 25 Business"; do you see that?</p>
<p style="text-align: right;">Page 111</p> <p>1 \$1,125,203.56. Do you see that?</p> <p>2 MS. HOOD: Object to form.</p> <p>3 A. Where is this?</p> <p>4 Q. (BY MR. BALLASES:) Sure. Right there. The 5 amount.</p> <p>6 A. Okay, yes.</p> <p>7 Q. Okay. Could you tell the Court why this 8 1.125 some-odd million was wired from -- from this 9 particular account, from your account, to Cazenovia 10 Creek Funding?</p> <p>11 MS. HOOD: Object to form.</p> <p>12 A. I don't remember it.</p> <p>13 Q. (BY MR. BALLASES:) Your daughter, Mobeen 14 Naeem Choudhri, she's a doctor, correct?</p> <p>15 A. Yes.</p> <p>16 Q. She has her own medical clinic?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. She doesn't participate in real estate 19 deals with her brother?</p> <p>20 A. No.</p> <p>21 Q. Okay. If we turn to the wire statement 22 that's dated January 30th, has a send date of January 23 30th, 2023. I'll find it for you. I don't like when 24 they print these so small.</p> <p>25 A. Uh-huh.</p>	<p style="text-align: right;">Page 113</p> <p>1 A. I want to verify these things. I don't 2 remember.</p> <p>3 Q. Okay. So as you sit here today -- well, 4 let's get to the amount.</p> <p>5 So the amount of this wire transfer from your 6 account was \$4 million. Do you see that?</p> <p>7 MS. HOOD: Object to form.</p> <p>8 A. Yes.</p> <p>9 Q. (BY MR. BALLASES:) Okay. So can you tell the 10 Court why \$4 million was wired from your account to 11 Heritage Title Company of Austin?</p> <p>12 A. I don't remember.</p> <p>13 MS. HOOD: Object to form.</p> <p>14 Q. (BY MR. BALLASES:) Okay. And if you noticed, 15 when it says "Originator to Beneficiary Info:", down 16 here at the bottom, it says "GF # JPB PBAX 507 17 Holdings, LLC"; do you see that?</p> <p>18 A. Where it is?</p> <p>19 MS. HOOD: Object to form.</p> <p>20 Q. (BY MR. BALLASES:) Right here.</p> <p>21 A. Yeah, okay.</p> <p>22 Q. Right there.</p> <p>23 A. Okay.</p> <p>24 Q. So it says "Originator to Beneficiary Info."</p> <p>25 A. Okay.</p>

<p style="text-align: right;">Page 114</p> <p>1 Q. Okay. You told us earlier in your deposition 2 you've had no involvement with a company called PBAX, 3 P-B-A-X, 507 Holdings, LLC. Do you recall that 4 testimony?</p> <p>5 MS. HOOD: Object to form.</p> <p>6 A. I don't remember at all.</p> <p>7 Q. (BY MR. BALLASES:) Right. You've never done 8 business with --</p> <p>9 A. No.</p> <p>10 MS. HOOD: Object to form.</p> <p>11 Q. (BY MR. BALLASES:) And you've told us when 12 this wire took place in January of 2023, you weren't 13 working, correct?</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. If you turn to -- let's see. It's 16 another wire statement. It's got the send date of 17 April 28th, 2023. I'll find it for you.</p> <p>18 Okay. So we're now looking still at Exhibit 19 32, which are wire statements from your Frost Bank 20 account. And --</p> <p>21 MS. HOOD: Object to form.</p> <p>22 Q. (BY MR. BALLASES:) -- on this particular wire 23 statement that is -- that shows the send date of April 24 28th of 2023, it shows that a wire was made from this 25 particular account. Do you see where it says</p>	<p style="text-align: right;">Page 116</p> <p>1 A. Yes.</p> <p>2 MS. HOOD: Object to form.</p> <p>3 Q. (BY MR. BALLASES:) Okay. As you sit here 4 today, you cannot tell the Court why this \$244,000 and 5 some-odd payment in April of '23 was made from your 6 account to Bridgeco Financial, can you?</p> <p>7 MS. HOOD: Object to form.</p> <p>8 A. Yes. I don't recognize this.</p> <p>9 Q. (BY MR. BALLASES:) Okay. You certainly 10 didn't authorize this, did you?</p> <p>11 A. I don't remember.</p> <p>12 MS. HOOD: Object to form.</p> <p>13 Q. (BY MR. BALLASES:) Okay. I want to stay 14 within Exhibit 32, but I want to go to the wire 15 statement that was dated October 27th, 2023. I'll find 16 it for you. October 27, 2023.</p> <p>17 Okay. I'm now showing you a wire statement 18 from Frost Bank that has the send date of October 27th, 19 2023. Do you see that document?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And do you see that this was another 22 wire payment and the Originator is your account. It 23 says "Mobeen Naeem Choudhri or Shahnaz Akhter 24 Choudhri"?</p> <p>25 MS. HOOD: Object to form.</p>
<p style="text-align: right;">Page 115</p> <p>1 "Originator"?</p> <p>2 MS. HOOD: Object to form.</p> <p>3 Q. (BY MR. BALLASES:) And it says "Mobeen Naeem 4 Choudhri or Shahnaz Akhter Choudhri"?</p> <p>5 A. Yes.</p> <p>6 MS. HOOD: Object to form.</p> <p>7 Q. (BY MR. BALLASES:) Okay. And it shows the 8 "Beneficiary" as "Bridgeco Financial, LLC"; do you see 9 that?</p> <p>10 MS. HOOD: Object to form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. BALLASES:) You have never done any 13 business with Bridgeco, have you?</p> <p>14 A. I don't remember.</p> <p>15 MS. HOOD: Object to form.</p> <p>16 Q. (BY MR. BALLASES:) Right. And it shows the 17 amount is "\$244,923.29"; do you see that?</p> <p>18 MS. HOOD: Object to form.</p> <p>19 A. Yes.</p> <p>20 Q. (BY MR. BALLASES:) Okay. And if you go to 21 the bottom again, it says "Bank to Bank Info." It says 22 "Purpose: Deal of Property"; do you see that?</p> <p>23 MS. HOOD: Object to form.</p> <p>24 Q. (BY MR. BALLASES:) It says "Purpose: Deal of 25 Property"; do you see that?</p>	<p style="text-align: right;">Page 117</p> <p>1 A. Yes.</p> <p>2 Q. (BY MR. BALLASES:) Okay. And it shows the 3 "Beneficiary" is "Gibb, Dunn & Crutcher LLP"; do you 4 see that?</p> <p>5 MS. HOOD: Object to form.</p> <p>6 A. Where is?</p> <p>7 Q. (BY MR. BALLASES:) "Beneficiary," right 8 there.</p> <p>9 A. Okay.</p> <p>10 Q. Okay. So it shows the "Beneficiary" as 11 "Gibb, Dunn & Crutcher, LLP"; do you see that?</p> <p>12 MS. HOOD: Object to form.</p> <p>13 A. Yes.</p> <p>14 Q. (BY MR. BALLASES:) Okay. Have you -- as you 15 sit here today, have you ever had to hire the law firm 16 of Gibson, Dunn & Crutcher, LLP?</p> <p>17 MS. HOOD: Object to form.</p> <p>18 A. I don't remember.</p> <p>19 Q. (BY MR. BALLASES:) Okay. If you had to hire 20 -- I think you've told us previously in your deposition 21 that your only lawyer you recall hiring is Ms. Hood; is 22 that right?</p> <p>23 MS. HOOD: Object to form.</p> <p>24 A. Yes.</p> <p>25 Q. (BY MR. BALLASES:) Okay. And if we look a</p>

<p style="text-align: right;">Page 118</p> <p>1 little bit higher on this bank -- on this wire 2 statement, it shows that a wire in the amount of 3 \$59,511 was wired out from this account. Do you see 4 that?</p> <p>5 MS. HOOD: Object to form.</p> <p>6 A. What's --</p> <p>7 Q. (BY MR. BALLASES:) Yeah, there's a number, 8 the amount.</p> <p>9 A. Oh, yes.</p> <p>10 Q. Yeah. See, it says "Amount" and then it's 11 got the --</p> <p>12 A. Uh-huh.</p> <p>13 Q. Okay. So as you sit here today, can you tell 14 the Court why this \$59,000 some-odd wire was made on 15 October 27th, 2023 from your account to this particular 16 law firm?</p> <p>17 MS. HOOD: Object to form.</p> <p>18 A. Yes. I can't recognize this at all.</p> <p>19 Q. (BY MR. BALLASES:) Okay. If we turn to -- 20 staying within Exhibit 32, but going to the wire 21 statement dated October 31st of 2023, so we're looking 22 at Halloween of last year. There you go.</p> <p>23 So looking at this particular wire payment 24 from this account -- see, it says "Originator," and it 25 says "Mobeen Naeem Choudhri or Shahnaz Akhter</p>	<p style="text-align: right;">Page 120</p> <p>1 A. Yes. I don't have a -- a problem memory, I 2 don't remember.</p> <p>3 Q. (BY MR. BALLASES:) Yeah. Okay. If we turn 4 to the same exhibit, Exhibit 32 and looking at the wire 5 statement dated November 16th of 2023. And I'll find 6 it for you to make it easy.</p> <p>7 Okay. So looking at the wire statement dated 8 November 16th, 2023, it's another wire out from this 9 account. And it says the "Originator" and it lists 10 yourself and your daughter as the originators. Do you 11 see that?</p> <p>12 A. Yes.</p> <p>13 MS. HOOD: Object to form.</p> <p>14 Q. (BY MR. BALLASES:) Okay. And it says the 15 "Beneficiary" is "Jetall Croix Properties, LL- -- LP" 16 -- excuse me. Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And this wire transfer was in the 19 amount of \$109,202.53. Do you see that?</p> <p>20 MS. HOOD: Object to form.</p> <p>21 A. Yes.</p> <p>22 Q. (BY MR. BALLASES:) Can you tell the Court why 23 you wired 109,000 some-odd dollars to Jetall Croix 24 Properties, LP, in November of '23?</p> <p>25 MS. HOOD: Object to form.</p>
<p style="text-align: right;">Page 119</p> <p>1 Choudhri"; do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And it shows the "Beneficiary" is 4 "Akin Gump Strauss Hauer & Feld LLP"; do you see that?</p> <p>5 A. Yes.</p> <p>6 MS. HOOD: Object to form.</p> <p>7 Q. (BY MR. BALLASES:) Right there.</p> <p>8 A. Okay.</p> <p>9 Q. Yeah, see "Beneficiary" there.</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And you've told us you've never hired 12 Akin Gump Strauss Hauer & Feld, LLP, those lawyers, 13 have you?</p> <p>14 MS. HOOD: Object to form.</p> <p>15 A. Yes. I don't remember at all.</p> <p>16 Q. (BY MR. BALLASES:) Yeah. And the amount of 17 the wire transfer from this account is \$50,000. Do you 18 see that?</p> <p>19 A. Yes.</p> <p>20 MS. HOOD: Object to form.</p> <p>21 Q. (BY MR. BALLASES:) As you sit here today, you 22 cannot tell the Court why this \$50,000 payment from 23 your account was made to the law firm of Akin Gump 24 Strauss Hauer & Feld, can you?</p> <p>25 MS. HOOD: Object to form.</p>	<p style="text-align: right;">Page 121</p> <p>1 A. I don't remember.</p> <p>2 Q. (BY MR. BALLASES:) Okay. If we turn now, 3 staying in Exhibit 32, but turn to the wire statement 4 that has a send date of February 26th of 2024. So just 5 about a few months ago.</p> <p>6 Okay. So looking at the wire statement that 7 has a send date of February 26th of 2024 in Exhibit 38, 8 (sic) do you see this is another wire out from your 9 account where Originator is stated?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And this wire is to -- the 12 "Beneficiary" is "Jetall Companies"; do you see that?</p> <p>13 MS. HOOD: Object to form.</p> <p>14 Q. (BY MR. BALLASES:) Right there.</p> <p>15 A. Yeah.</p> <p>16 Q. Okay. And that is a wire of \$100,000 from 17 your account to Jetall Companies; is that right?</p> <p>18 MS. HOOD: Object to form.</p> <p>19 A. I don't remember.</p> <p>20 Q. (BY MR. BALLASES:) Okay. Did you instruct 21 your bank to this wire or do you not recall?</p> <p>22 MS. HOOD: Object to form.</p> <p>23 A. I don't remember.</p> <p>24 Q. (BY MR. BALLASES:) Okay. If you stay on 25 Exhibit 32, but go to the wire send date of March 15th,</p>

<p style="text-align: right;">Page 122</p> <p>1 2024, which I can help you get to.</p> <p>2 Okay. So on Exhibit 32, looking at the wire</p> <p>3 statement that has a send date of March 15th, 2024, it</p> <p>4 shows another wire from your account. The "Originator"</p> <p>5 is "Mobeen Naeem Choudhri or Shahnaz Akhter Choudhri";</p> <p>6 do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. The "Beneficiary" is "Holland & Knight</p> <p>9 LLP"; do you see that?</p> <p>10 MS. HOOD: Object to form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. BALLASES:) Right there.</p> <p>13 A. Okay.</p> <p>14 Q. Okay. And it says "Retainer Account" there.</p> <p>15 Do you see that right next to their name?</p> <p>16 A. Yes.</p> <p>17 MS. HOOD: Object to form.</p> <p>18 Q. (BY MR. BALLASES:) Okay. Have you ever had</p> <p>19 to hire a lawyer at the law firm of Holland & Knight,</p> <p>20 LLP?</p> <p>21 MS. HOOD: Object to form.</p> <p>22 A. No.</p> <p>23 Q. (BY MR. BALLASES:) Okay. And it shows that</p> <p>24 the amount wired from your account to that law firm was</p> <p>25 \$30,000. Do you see that?</p>	<p style="text-align: right;">Page 124</p> <p>1 Q. Okay. Do you know what Select Portfolio</p> <p>2 Servicing, Inc., is?</p> <p>3 MS. HOOD: Object to form.</p> <p>4 A. Yes.</p> <p>5 Q. (BY MR. BALLASES:) Do you recognize the name</p> <p>6 Select Portfolio Servicing, Inc.?</p> <p>7 MS. HOOD: Object to form.</p> <p>8 MR. CHAUDHRI: Objection, form.</p> <p>9 A. Maybe there's a loan. I don't remember.</p> <p>10 Q. (BY MR. BALLASES:) Okay. Have you ever done</p> <p>11 business with Select Portfolio Servicing, Inc.?</p> <p>12 A. No. No.</p> <p>13 MR. CHAUDHRI: Objection, form.</p> <p>14 MS. HOOD: Object to form.</p> <p>15 Q. (BY MR. BALLASES:) Okay. And so you can see</p> <p>16 this wire was in the amount of \$17,191.98. Do you see</p> <p>17 that?</p> <p>18 A. Yes.</p> <p>19 MS. HOOD: Object to form.</p> <p>20 Q. (BY MR. BALLASES:) Okay. As you sit here</p> <p>21 today, you cannot tell the Court why this wire payment</p> <p>22 was made to Select Portfolio Servicing, Inc., can you?</p> <p>23 A. Yes.</p> <p>24 MR. CHAUDHRI: Object to form.</p> <p>25 MS. HOOD: Object to form.</p>
<p style="text-align: right;">Page 123</p> <p>1 MS. HOOD: Object to form.</p> <p>2 A. Okay.</p> <p>3 Q. (BY MR. BALLASES:) Okay. So as you sit here</p> <p>4 today, you cannot tell the Court why there was a wire</p> <p>5 made in March of 2024 for \$30,000 from your account to</p> <p>6 the law firm of Holland & Knight, LLP, can you?</p> <p>7 MS. HOOD: Object to form.</p> <p>8 A. Yes. I don't recognize this.</p> <p>9 Q. (BY MR. BALLASES:) Okay. You didn't</p> <p>10 authorize this to be made?</p> <p>11 A. I don't remember.</p> <p>12 MS. HOOD: Object to form.</p> <p>13 Q. (BY MR. BALLASES:) Okay. Can you turn to the</p> <p>14 next wire statement. Okay. This one's March 20th of</p> <p>15 2024, still within Exhibit 32. It's another wire</p> <p>16 statement that has a send date of March 20th, 2024 and</p> <p>17 you can see the Originator is this account, it's your</p> <p>18 account with "Mobeen Naeem Choudhri or Shahnaz Akhter</p> <p>19 Choudhri"; do you see that?</p> <p>20 A. Yes.</p> <p>21 MS. HOOD: Object to form.</p> <p>22 Q. (BY MR. BALLASES:) Okay. And the</p> <p>23 "Beneficiary" is "Select Portfolio Servicing, Inc."; do</p> <p>24 you see that?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 125</p> <p>1 A. I can't. I don't remember.</p> <p>2 Q. (BY MR. BALLASES:) You didn't authorize this</p> <p>3 wire to be made, did you?</p> <p>4 A. I don't remember.</p> <p>5 MR. CHAUDHRI: Objection, form.</p> <p>6 MS. HOOD: Objection, form.</p> <p>7 Q. (BY MR. BALLASES:) Okay. And then if we turn</p> <p>8 to the same Exhibit 32, but if we turn to the wire</p> <p>9 statement that was made on April 12th of 2024. And</p> <p>10 I'll find it for you.</p> <p>11 So looking at Exhibit 32 at the wire</p> <p>12 statement that has a send date of April 12th of 2024.</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 MR. CHAUDHRI: Objection, form.</p> <p>16 Q. (BY MR. BALLASES:) Okay. And this is another</p> <p>17 wire out of your account here at Frost, it says</p> <p>18 "Originator" and it lists the account number and it</p> <p>19 says "Mobeen Naeem Choudhri or Shahnaz Akhter</p> <p>20 Choudhri"; do you see that?</p> <p>21 MR. CHAUDHRI: Objection, form.</p> <p>22 MS. HOOD: Object to form.</p> <p>23 Q. (BY MR. BALLASES:) Okay. And it says the</p> <p>24 "Beneficiary" --</p> <p>25 THE REPORTER: I didn't get her</p>

<p style="text-align: right;">Page 126</p> <p>1 answer.</p> <p>2 I didn't get your answer. I'm sorry.</p> <p>3 MR. BALLASES: I'll ask again.</p> <p>4 Q. (BY MR. BALLASES:) So do you see,</p> <p>5 Ms. Choudhri, that the Originator for this particular</p> <p>6 wire transfer is this particular account, your account,</p> <p>7 at Frost Bank that we've been discussing?</p> <p>8 MR. CHAUDHRI: Objection to form.</p> <p>9 MS. HOOD: Object to form.</p> <p>10 A. Yes. I don't remember.</p> <p>11 Q. (BY MR. BALLASES:) Yeah, but do you see it's</p> <p>12 from your account?</p> <p>13 MR. CHAUDHRI: Objection, form.</p> <p>14 A. I don't know.</p> <p>15 Q. (BY MR. BALLASES:) Okay. Do you see that it</p> <p>16 shows your account number right there?</p> <p>17 A. Yes.</p> <p>18 MS. HOOD: Objection, form.</p> <p>19 MR. CHAUDHRI: Objection, form.</p> <p>20 Q. (BY MR. BALLASES:) And we looked earlier at</p> <p>21 Exhibit 30 and 31 and it had that same account number?</p> <p>22 A. Yes.</p> <p>23 MR. CHAUDHRI: Objection, form.</p> <p>24 MS. HOOD: Objection, form.</p> <p>25 Q. (BY MR. BALLASES:) Okay. And then it shows</p>	<p style="text-align: right;">Page 128</p> <p>1 MS. HOOD: Object to form. I object</p> <p>2 to your representation --</p> <p>3 MR. CHAUDHRI: Objection, form.</p> <p>4 MS. HOOD: -- of what this document</p> <p>5 is.</p> <p>6 Q. (BY MR. BALLASES:) Okay. So if we look at</p> <p>7 the first page of exhibit -- strike that.</p> <p>8 If we look at the -- the wire statement that</p> <p>9 has a send date of February 3rd of 2021, which I'll go</p> <p>10 to for you.</p> <p>11 Okay. So what you can see now in Exhibit 33</p> <p>12 is a wire statement dated February 3rd, 2021. Do you</p> <p>13 see that?</p> <p>14 A. Yes.</p> <p>15 MS. HOOD: Object to form.</p> <p>16 Q. (BY MR. BALLASES:) And here it shows that the</p> <p>17 originator of the wire, if you look at the bottom, is</p> <p>18 "Meandering Bend LLC"; do you see that?</p> <p>19 MS. HOOD: Object to form.</p> <p>20 MR. CHAUDHRI: Objection, form.</p> <p>21 A. Okay.</p> <p>22 Q. (BY MR. BALLASES:) Okay. So you see where it</p> <p>23 says "Originator" and "Meandering Bend LLC"?</p> <p>24 A. Yes.</p> <p>25 MR. CHAUDHRI: Objection, form.</p>
<p style="text-align: right;">Page 127</p> <p>1 that the "Beneficiary" is "Jetall Companies"; do you</p> <p>2 see that?</p> <p>3 A. Yes.</p> <p>4 MS. HOOD: Object to form.</p> <p>5 MR. CHAUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. And then it shows</p> <p>7 the amount is \$30,000?</p> <p>8 MS. HOOD: Objection, form.</p> <p>9 MR. CHAUDHRI: Objection, form.</p> <p>10 Q. (BY MR. BALLASES:) Okay. So let me ask you,</p> <p>11 did you authorize this particular wire to be made from</p> <p>12 your account to Jetall Companies for \$30,000?</p> <p>13 A. Yes. I don't remember.</p> <p>14 MR. CHAUDHRI: Objection, form.</p> <p>15 MS. HOOD: Objection, form.</p> <p>16 Q. (BY MR. BALLASES:) Okay. I'm now going to</p> <p>17 hand you Exhibit 23 -- excuse me -- Exhibit 33 to your</p> <p>18 deposition. Here you go.</p> <p>19 (Exhibit No. 33 marked.)</p> <p>20 A. Okay.</p> <p>21 Q. (BY MR. BALLASES:) Okay. Ms. Choudhri, so</p> <p>22 I'll represent to you, these are wires into your Frost</p> <p>23 Bank account that we're going to discuss next. That is</p> <p>24 Exhibit 33. Do you see that?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 129</p> <p>1 Q. (BY MR. BALLASES:) Okay. And then it says</p> <p>2 the "Beneficiary" is this account, it lists this</p> <p>3 account, and it lists Mobeen Choudhri. Do you see</p> <p>4 that?</p> <p>5 A. Yes.</p> <p>6 MR. CHAUDHRI: Objection, form.</p> <p>7 MS. HOOD: Object to form.</p> <p>8 Q. (BY MR. BALLASES:) Okay. And the amount is</p> <p>9 one million dollars. Do you see that?</p> <p>10 MR. CHAUDHRI: Objection, form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>13 Court as you sit here today why this one-million-dollar</p> <p>14 wire was made into your account that was made in</p> <p>15 February of 2021?</p> <p>16 MS. HOOD: Object to form.</p> <p>17 MR. CHAUDHRI: Objection, form.</p> <p>18 A. I don't remember at all.</p> <p>19 Q. (BY MR. BALLASES:) Okay. You've told us</p> <p>20 already that you never did business with or for</p> <p>21 Meandering Bend, LLC, do you remember?</p> <p>22 MS. HOOD: Objection to form.</p> <p>23 MR. CHAUDHRI: Objection, form.</p> <p>24 Misstates the answer. She says "I don't remember."</p> <p>25 Q. (BY MR. BALLASES:) Do you even -- do you even</p>

<p style="text-align: right;">Page 130</p> <p>1 -- do you have any recollection of -- or have you -- 2 strike that.</p> <p>3 Have you ever heard of Meandering Bend, LLC, 4 outside of this deposition?</p> <p>5 MR. CHAUDHRI: Objection, form.</p> <p>6 MS. HOOD: Objection, form.</p> <p>7 A. I don't remember.</p> <p>8 Q. (BY MR. BALLASES:) Okay. Are you familiar 9 with Meandering Bend or do you know -- I think you 10 don't know, but I want to ask. Do you know if 11 Meandering Bend is Mr. -- is one of Mr. Ali Choudhri's 12 businesses?</p> <p>13 A. I don't know.</p> <p>14 MR. CHAUDHRI: Objection to form.</p> <p>15 MS. HOOD: Object to form and the 16 representation.</p> <p>17 Q. (BY MR. BALLASES) Because I want to refresh 18 your recollection, so if you look at Exhibit 34 to your 19 deposition, this is a "Texas Franchise Tax Public 20 Information Report"; do you see that?</p> <p>21 (Exhibit No. 34 marked.)</p> <p>22 A. Yes.</p> <p>23 MR. CHAUDHRI: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) It's from the year 2022.</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 132</p> <p>1 that -- this wire shows the "Originator" of the wire 2 was a company called "PBAC 507 Holdings, LLC"; do you 3 see that?</p> <p>4 MR. CHAUDHRI: Objection, form.</p> <p>5 A. Yes.</p> <p>6 Q. (BY MR. BALLASES:) Okay. And it says the 7 "Beneficiary" is your account. It says the account 8 number and it says "Shahnaz Choudhri"; do you see that?</p> <p>9 A. Yes.</p> <p>10 MS. HOOD: Object to form.</p> <p>11 Q. (BY MR. BALLASES:) Okay. And this transfer 12 is in the amount of \$1 million. Do you see that?</p> <p>13 MR. CHAUDHRI: Objection, form.</p> <p>14 A. Yes.</p> <p>15 Q. (BY MR. BALLASES:) Okay. Do you have a 16 recollection of why PBAC 507 Holdings, LLC, wired \$1 17 million into your account on or about November 15th of 18 2021?</p> <p>19 MR. CHAUDHRI: Objection, form.</p> <p>20 MS. HOOD: Objection, form.</p> <p>21 A. No, I don't remember.</p> <p>22 Q. (BY MR. BALLASES:) Okay. You've never done 23 -- and you told us this before, but just so it's clear, 24 you've never done any business with or for PBAC 507, 25 have you?</p>
<p style="text-align: right;">Page 131</p> <p>1 MR. CHAUDHRI: Objection, form.</p> <p>2 Q. (BY MR. BALLASES:) Okay. And it's for the 3 taxpayer name Meandering Bend, LLC?</p> <p>4 MR. CHAUDHRI: Objection, form.</p> <p>5 A. I don't know.</p> <p>6 Q. (BY MR. BALLASES:) Right there. Do you see 7 that?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And if you look a little down under 10 Section A, it says under name, it says "Ali Choudhri, 11 manager"; do you see that?</p> <p>12 MR. CHAUDHRI: Objection, form.</p> <p>13 A. Yes.</p> <p>14 Q. (BY MR. BALLASES:) Okay. Getting back to 15 Exhibit 33 and turning to the wire statement dated 16 November 9th, 2022, I'll turn to it for you. Okay. So 17 I jumped ahead of myself.</p> <p>18 If we could look at the wire statement dated 19 11/15/22. Okay. So Exhibit 33 still we're looking at, 20 it shows a wire statement date or send date of 11 -- 21 November 15, 2021. Do you see that at the top?</p> <p>22 MR. CHAUDHRI: Objection, form.</p> <p>23 MS. HOOD: Same objection.</p> <p>24 A. It is. Okay.</p> <p>25 Q. (BY MR. BALLASES:) Okay. And this one shows</p>	<p style="text-align: right;">Page 133</p> <p>1 A. Yes.</p> <p>2 MS. HOOD: Objection, form.</p> <p>3 MR. CHAUDHRI: Objection, form.</p> <p>4 That's not -- you're misstating the answer. Her answer 5 was "I don't remember." Don't misstate the answer.</p> <p>6 MR. BALLASES: Object to form.</p> <p>7 Q. (BY MR. BALLASES:) So my recollection from 8 your first deposition is that you've never done --</p> <p>9 MR. CHAUDHRI: I thought this was a 10 continuation of the deposition, Mr. Ballases.</p> <p>11 Q. (BY MR. BALLASES:) My recollection from your 12 first deposition is that you stated that you've never 13 done business with or for PBAC 507 Holdings, LLC.</p> <p>14 A. Yes.</p> <p>15 MS. HOOD: Object to form.</p> <p>16 Q. (BY MR. BALLASES:) Okay. You don't know -- 17 you don't recognize that name?</p> <p>18 A. No. No.</p> <p>19 Q. Okay.</p> <p>20 MR. CHAUDHRI: Objection, form.</p> <p>21 Q. (BY MR. BALLASES:) So as you sit here today 22 --</p> <p>23 MR. CHAUDHRI: You're misstating the 24 testimony. Her testimony was she doesn't remember.</p> <p>25 You're misstating the --</p>

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1	MR. BALLASES: Please --	1 your account in or around November of 2022?
2	MR. CHAUDHRI: -- testimony.	2 A. I don't remember.
3	MR. BALLASES: -- please object to the	3 MR. CHAUDHRI: Objection, form.
4	form of the objection as the rules require and you can	4 MS. HOOD: Object to form.
5	take it up with the Judge.	5 Q. (BY MR. BALLASES:) Okay. If we stay on
6	MR. CHAUDHRI: Objection, you're	6 Exhibit 33, but turn to the wire statement with the
7	misstating the -- her answer from her prior deposition.	7 send date of December 14th, 2022. Okay.
8	MR. BALLASES: Okay.	8 Okay. Ms. Choudhri, Exhibit 33 still we're
9	MR. CHAUDHRI: And this is a	9 now looking at the wire statement that has a send date
10	continuation of that deposition.	10 of December 14th, 2022. Do you see that send date at
11	Q. (BY MR. BALLASES:) Okay. So as you sit here	11 the top?
12	today, you cannot tell Judge Norman why PBAC 507	12 MS. HOOD: Object to form.
13	Holdings, LLC, wired \$1 million into your account	13 A. Okay.
14	around November of 2021?	14 Q. (BY MR. BALLASES:) Okay. Do you see that the
15	A. I don't remember it at all.	15 Originator of this wire, if you look at the bottom
16	MR. CHAUDHRI: Objection, form.	16 where it says "Originator" is "Caz Creek Holdings,
17	Q. (BY MR. BALLASES:) Okay. If we turn to	17 LLC"?
18	the -- staying within Exhibit 33, but we turn to the	18 MR. CHAUDHRI: Objection, form.
19	wire statement -- wire send date statement of 11,	19 MS. HOOD: Objection, form.
20	November, 9th, 2022. I'll find it for you to make it	20 Q. (BY MR. BALLASES:) Do you see that?
21	easy. Okay.	21 A. Yes.
22	Okay. So looking at the wire statement with	22 Q. Okay. And the "Beneficiary" is this account?
23	the send date of November 9th, 2022, do you see that in	23 Do you see that?
24	front of you?	24 A. Yes.
25	MR. CHAUDHRI: Objection, form.	25 MR. CHAUDHRI: Objection, form.
Page 135		Page 137
1	A. Yeah.	1 Q. (BY MR. BALLASES:) Okay. And the amount of
2	Q. (BY MR. BALLASES:) Okay. And it shows the	2 wire is 1.125 -- well, let me just say it. The amount
3	"Originator" is -- the bottom of this wire is "Ali	3 of the wire is \$1,125,203.56. Do you see that?
4	Choudhri"; do you see that?	4 MR. CHAUDHRI: Objection, form.
5	MR. CHAUDHRI: Objection, form.	5 A. No. I don't know.
6	A. Oh, okay.	6 Q. (BY MR. BALLASES:) Right there?
7	Q. (BY MR. BALLASES:) Do you see it?	7 A. No, I don't know.
8	A. Yes.	8 Q. Okay. But you see the amount of the wire --
9	Q. Okay. And it shows, by the way, his Account	9 A. Yes.
10	No. 7110232. Do you see that above his name?	10 MR. CHAUDHRI: Objection, form.
11	MR. CHAUDHRI: Objection, form.	11 Q. (BY MR. BALLASES:) -- is \$1,125,203.56?
12	A. I don't know.	12 A. Yes.
13	Q. (BY MR. BALLASES:) Do you see that right	13 Q. Okay. My question to you is, could you tell
14	above his name?	14 the Court why Caz Creek Holdings, LLC, was wiring about
15	A. Yeah.	15 \$1.1 million into your account in December of 2022?
16	Q. Do you know what bank that is?	16 MR. CHAUDHRI: Objection, form.
17	A. I don't know.	17 MS. HOOD: Objection, form.
18	MS. HOOD: Objection, form.	18 A. I don't know.
19	MR. CHAUDHRI: Objection, form.	19 Q. (BY MR. BALLASES:) Okay. You've told us
20	Q. (BY MR. BALLASES:) Okay. And the amount of	20 previously Caz Creek Holdings, LLC, you don't have any
21	this wire into this account is \$4,650,000"; do you see	21 recollection of what that company is, do you?
22	that?	22 MR. CHAUDHRI: Objection, form.
23	A. Yes.	23 A. Yes. I don't remember.
24	Q. Okay. As you sit here today, can you tell	24 Q. (BY MR. BALLASES:) Yeah. Have you even heard
25	Judge Norman why Ali Choudhri wired 4.65 million into	25 of Caz Creek Holdings, LLC, aside from your deposition?

<p style="text-align: right;">Page 138</p> <p>1 MR. CHOUHDRI: Objection, form.</p> <p>2 MS. HOOD: Objection, form. Asked and</p> <p>3 answered.</p> <p>4 A. No.</p> <p>5 Q. (BY MR. BALLASES:) Okay. Continuing on with</p> <p>6 Exhibit 33, but if we turn to the wire statement with</p> <p>7 the send date of January 30th, 2023.</p> <p>8 Okay. So still on Exhibit 33, looking at the</p> <p>9 wire statement with the send date of January 30th,</p> <p>10 2023, do you see that document?</p> <p>11 MR. CHOUHDRI: Objection, form.</p> <p>12 MS. HOOD: Objection, form.</p> <p>13 Q. (BY MR. BALLASES:) Okay. And this document,</p> <p>14 if you look at the bottom, it shows the "Originator" of</p> <p>15 this wire and it says the "Originator" is "Heritage</p> <p>16 Title Company of Austin Inc.>; do you see that?</p> <p>17 MR. CHOUHDRI: Objection, form.</p> <p>18 MS. HOOD: Object to form.</p> <p>19 A. Yes. Oh, yes.</p> <p>20 Q. (BY MR. BALLASES:) Right there where it says</p> <p>21 "Originator."</p> <p>22 MR. CHOUHDRI: Objection, form.</p> <p>23 Q. (BY MR. BALLASES:) Okay. And the</p> <p>24 "Beneficiary" is this account. It says the Account No.</p> <p>25 100686328. Do you see that?</p>	<p style="text-align: right;">Page 140</p> <p>1 MR. CHOUHDRI: Objection, form.</p> <p>2 Q. (BY MR. BALLASES:) It's Valentine's Day.</p> <p>3 Okay. So looking at Exhibit 33 and the wire</p> <p>4 statement with the send date of February 14th, 2023; do</p> <p>5 you see that document?</p> <p>6 A. Yes.</p> <p>7 MR. CHOUHDRI: Objection, form.</p> <p>8 Q. (BY MR. BALLASES:) Okay. If you look at the</p> <p>9 bottom where it says the "Originator" it says the</p> <p>10 "Originator" is "Heritage Title Company of Austin,</p> <p>11 Inc.>; do you see that?</p> <p>12 A. Yes.</p> <p>13 MR. CHOUHDRI: Objection, form.</p> <p>14 Q. (BY MR. BALLASES:) Okay. And it shows the</p> <p>15 "Beneficiary" and it shows your account number again?</p> <p>16 A. Yes.</p> <p>17 MR. CHOUHDRI: Objection, form.</p> <p>18 Q. (BY MR. BALLASES:) Okay. And it shows this</p> <p>19 wire amount is \$6,051,000. Do you see that?</p> <p>20 A. Yes.</p> <p>21 MS. HOOD: Objection, form.</p> <p>22 MR. CHOUHDRI: Objection, form.</p> <p>23 Q. (BY MR. BALLASES:) Can you tell the Court why</p> <p>24 this particular title company wired in excess of \$6</p> <p>25 million into your account in February of 2023?</p>
<p style="text-align: right;">Page 139</p> <p>1 MR. CHOUHDRI: Objection, form.</p> <p>2 A. Yes.</p> <p>3 Q. (BY MR. BALLASES:) Okay. And this wire from</p> <p>4 the title company was in the amount of half-a-million</p> <p>5 dollars. Do you see that?</p> <p>6 A. Yes.</p> <p>7 MR. CHOUHDRI: Objection, form.</p> <p>8 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>9 Court why Heritage Title Company wired half-a-million</p> <p>10 dollars into your account on January -- or in January</p> <p>11 of 2023?</p> <p>12 MR. CHOUHDRI: Objection, form.</p> <p>13 MS. HOOD: Objection, form.</p> <p>14 A. Yes. I don't remember.</p> <p>15 Q. (BY MR. BALLASES:) And you've told us in 2023</p> <p>16 you were retired?</p> <p>17 MR. CHOUHDRI: Objection, form.</p> <p>18 Misstates the answer. She never said that.</p> <p>19 MR. BALLASES: Please object to the</p> <p>20 form of your questions. Stick to the Rules.</p> <p>21 MR. CHOUHDRI: Objection, form.</p> <p>22 Sidebar.</p> <p>23 Q. (BY MR. BALLASES:) If you turn to -- stay on</p> <p>24 Exhibit 33, but turn to the wire statement with the</p> <p>25 send date of February 14th, 2023.</p>	<p style="text-align: right;">Page 141</p> <p>1 A. I don't know.</p> <p>2 MS. HOOD: Object to form.</p> <p>3 MR. CHOUHDRI: Objection, form.</p> <p>4 Q. (BY MR. BALLASES:) Okay. You at that time</p> <p>5 were retired, you weren't transacting business, were</p> <p>6 you?</p> <p>7 A. I don't remember at all.</p> <p>8 MR. CHOUHDRI: Objection, form.</p> <p>9 Q. (BY MR. BALLASES:) Yeah. If we could turn,</p> <p>10 staying in Exhibit 33, if we could turn to the wire</p> <p>11 statement dated February 26th of 2024. And I'll go to</p> <p>12 --</p> <p>13 MR. CHOUHDRI: Objection, form.</p> <p>14 Q. (BY MR. BALLASES:) -- it for you.</p> <p>15 Okay. So still within Exhibit 33, but</p> <p>16 looking at the wire statement with a send date of</p> <p>17 February 26th of 2024, so a few months ago. Do you</p> <p>18 see -- are you looking at that page?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. On it, when you look at the bottom, it</p> <p>21 says the "Originator" of this wire transfer was</p> <p>22 "Fidelity National Title Agency Inc.>; do you see that?</p> <p>23 MR. CHOUHDRI: Objection, form.</p> <p>24 MS. HOOD: Object to form.</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 142</p> <p>1 Q. (BY MR. BALLASES:) Okay. And it says the 2 "Beneficiary" and it lists your account number?</p> <p>3 A. Yes.</p> <p>4 MR. CHOUHDRI: Objection, form.</p> <p>5 MS. HOOD: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. And the amount is 7 \$100,000?</p> <p>8 MR. CHOUHDRI: Objection, form.</p> <p>9 MS. HOOD: Objection, form.</p> <p>10 A. Yes.</p> <p>11 Q. (BY MR. BALLASES:) Can you tell Judge Norman 12 why the title company -- Fidelity National Title Agency 13 was wiring \$100,000 into your account in February of 14 2024?</p> <p>15 MR. CHOUHDRI: Objection, form.</p> <p>16 MS. HOOD: Object to form.</p> <p>17 A. I don't know. I don't remember at all.</p> <p>18 Q. (BY MR. BALLASES:) Right. You were retired 19 at that point?</p> <p>20 A. I don't know.</p> <p>21 MR. CHOUHDRI: Objection, form.</p> <p>22 Q. (BY MR. BALLASES:) Okay. I'm now going to 23 hand you Exhibit 35 to your deposition. Ms. Choudhri, 24 and these are checks that were -- I'll represent to 25 you, these are checks that were written from this</p>	<p style="text-align: right;">Page 144</p> <p>1 Q. (BY MR. BALLASES:) Okay.</p> <p>2 MR. CHOUHDRI: Mr. Ballases, where did 3 you obtain these bank records? Are these bank records 4 that you obtained?</p> <p>5 Q. (BY MR. BALLASES:) So if you look --</p> <p>6 MR. CHOUHDRI: Mr. Ballases, can you 7 identify where these records are from?</p> <p>8 MR. BALLASES: No.</p> <p>9 Q. (BY MR. BALLASES:) If you -- can you look at 10 the check date September 20th of 2022?</p> <p>11 MS. HOOD: Object to form.</p> <p>12 A. Yes.</p> <p>13 Q. (BY MR. BALLASES:) I can help you find it.</p> <p>14 Yeah. You got it. Perfect.</p> <p>15 MR. CHOUHDRI: Mr. Ballases, --</p> <p>16 Q. (BY MR. BALLASES:) Okay.</p> <p>17 MR. CHOUHDRI: -- why are you refusing 18 --</p> <p>19 MR. BALLASES: This is my deposition. 20 This is not the time to discuss this. You have already 21 gone in front of the Judge repeatedly.</p> <p>22 MR. CHOUHDRI: You have --</p> <p>23 MR. BALLASES: So --</p> <p>24 MS. HOOD: No, we haven't, but ask 25 your questions and we'll keep objecting.</p>
<p style="text-align: right;">Page 143</p> <p>1 account to third parties. There's only a few of them 2 I'm going to talk about.</p> <p>3 MR. BALLASES: Is this 35 or 34?</p> <p>4 MS. HOOD: I have it as 35.</p> <p>5 MR. BALLASES: Okay. Yeah, you're 6 right.</p> <p>7 (Exhibit No. 35 marked.)</p> <p>8 Q. (BY MR. BALLASES:) Okay. Exhibit 35, you can 9 see just looking at the first page, you can see these 10 are checks from your account says "Mobeen N. Choudhri 11 or Shahnaz A. Choudhri" and it's got the Account No. 12 100686328?</p> <p>13 A. Yes.</p> <p>14 MR. CHOUHDRI: Objection, form.</p> <p>15 Q. (BY MR. BALLASES) And it says "Frost Bank" on 16 it?</p> <p>17 MR. CHOUHDRI: Objection, form.</p> <p>18 MS. HOOD: Object to form. You have 19 not --</p> <p>20 Q. (BY MR. BALLASES:) Do you see that?</p> <p>21 MS. HOOD: -- produced anything that 22 shows where this came from --</p> <p>23 MR. BALLASES: Okay.</p> <p>24 MS. HOOD: -- and I object to our 25 assertion that is from her bank accounts.</p>	<p style="text-align: right;">Page 145</p> <p>1 MR. CHOUHDRI: Mr. Ballases, are you 2 refusing to provide where you received these documents 3 from?</p> <p>4 Q. (BY MR. BALLASES:) So if look on this 5 particular check --</p> <p>6 MR. CHOUHDRI: You're going to ignore 7 my --</p> <p>8 Q. (BY MR. BALLASES:) -- within Exhibit 35, 9 there is a check written. It says the "Remitter" is 10 you, "Shahnaz Choudhri," and the date is September 11 20th, 2002. And it's "Pay to the order of: George 12 Lee, 35 River Crest." Do you see that?</p> <p>13 A. Yes.</p> <p>14 MR. CHOUHDRI: Object to form.</p> <p>15 MS. HOOD: Objection, form.</p> <p>16 Q. (BY MR. BALLASES:) Okay. And the amount is 17 half a million dollars. Do you see that?</p> <p>18 MR. CHOUHDRI: Objection, form.</p> <p>19 MS. HOOD: Object to form.</p> <p>20 Q. (BY MR. BALLASES:) Okay. Have you ever done 21 any business with George Lee?</p> <p>22 MR. CHOUHDRI: Objection, form.</p> <p>23 MS. HOOD: Objection, form.</p> <p>24 A. I don't know.</p> <p>25 Q. (BY MR. BALLASES:) Okay. Do you know who</p>

<p>1 George Lee is?</p> <p>2 MS. HOOD: Object to form.</p> <p>3 MR. CHAUDHRI: Objection, form.</p> <p>4 A. No.</p> <p>5 Q. (BY MR. BALLASES:) Okay. So as you sit here</p> <p>6 today, do you recall making a cashier's check or</p> <p>7 instructing your bank to make a cashier's check for</p> <p>8 half a million dollars in September of 2022 to pay</p> <p>9 George Lee?</p> <p>10 A. I don't know --</p> <p>11 MS. HOOD: Object to form.</p> <p>12 MR. CHAUDHRI: Objection, form.</p> <p>13 Q. (BY MR. BALLASES:) Okay. You didn't</p> <p>14 authorize this payment, did you?</p> <p>15 MS. HOOD: Object to form.</p> <p>16 MR. CHAUDHRI: Objection, form.</p> <p>17 Let's -- let's clarify the answer.</p> <p>18 Her answer is "I don't recall." I just want to make</p> <p>19 sure that you're not misunderstanding her answer.</p> <p>20 Q. (BY MR. BALLASES:) Okay. So if we turn to</p> <p>21 the next check, which is dated February 17th, 2023 or</p> <p>22 to the check that's dated February 17th, 2023. There</p> <p>23 you go. Okay.</p> <p>24 MS. HOOD: Just -- just a minute. Are</p> <p>25 we close to getting to the end because we're at 38</p>	<p>Page 146</p> <p>1 A. Yes.</p> <p>2 Q. Okay. If you see -- when we left we were</p> <p>3 looking at check dated February 17th of 2023. It's</p> <p>4 found within Exhibit 35 to your deposition. Do you see</p> <p>5 that check in front of you?</p> <p>6 MR. CHAUDHRI: Objection to form.</p> <p>7 MS. HOOD: Object to form.</p> <p>8 A. Yes.</p> <p>9 Q. (BY MR. BALLASES:) Okay. So this is a</p> <p>10 cashier's check and, again, it says the "Remitter" is</p> <p>11 yourself. It says "Shahnaz Akhter Choudhri"; do you</p> <p>12 see that?</p> <p>13 A. Yes.</p> <p>14 MR. CHAUDHRI: Objection, form.</p> <p>15 Q. (BY MR. BALLASES:) And it's in the amount of</p> <p>16 One million, seven hundred twenty-six dollars -- or</p> <p>17 excuse me -- \$1,726,200.14. Do you see that?</p> <p>18 A. Yes.</p> <p>19 MR. CHAUDHRI: Objection, form.</p> <p>20 Q. (BY MR. BALLASES:) Okay. And it's payable to</p> <p>21 "Marilyn Burgess, Harris County District Clerk."</p> <p>22 MR. CHAUDHRI: Objection, form.</p> <p>23 MS. HOOD: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) Do you see that?</p> <p>25 A. I don't remember.</p>
<p>1 minutes.</p> <p>2 MR. BALLASES: Do you want to take a</p> <p>3 break?</p> <p>4 MS. HOOD: Yes.</p> <p>5 MR. BALLASES: Okay. Let's take a</p> <p>6 break.</p> <p>7 THE VIDEOGRAPHER: Off the record at</p> <p>8 2:50.</p> <p>9 (Off the record.)</p> <p>10 THE VIDEOGRAPHER: We're back on the</p> <p>11 record at 2:56.</p> <p>12 Q. (BY MR. BALLASES:) Ms. Choudhri --</p> <p>13 MS. HOOD: Just for a minute --</p> <p>14 MR. CHAUDHRI: Sure.</p> <p>15 MS. HOOD: Can -- Ms. Mendez, can you</p> <p>16 identify who your employer is for me because I don't</p> <p>17 think that was ever stated. And I'd like to have it as</p> <p>18 attendance on the -- at the depo.</p> <p>19 MS. MENDEZ: Osama Abdullatif.</p> <p>20 MS. HOOD: Personally or for his</p> <p>21 company?</p> <p>22 MS. MENDEZ: For his company.</p> <p>23 MS. HOOD: Okay. Thank you.</p> <p>24 Q. (BY MR. BALLASES:) Ms. Choudhri, we're back</p> <p>25 from a short break. Are you ready to get started?</p>	<p>Page 147</p> <p>Page 149</p> <p>1 Q. Right there? Do you see that, though?</p> <p>2 A. Yes.</p> <p>3 Q. Okay.</p> <p>4 MR. CHAUDHRI: Objection form.</p> <p>5 Q. (BY MR. BALLASES:) You -- you don't have a</p> <p>6 recollection of -- well, strike that.</p> <p>7 Do you know why this check was written?</p> <p>8 MR. CHAUDHRI: Objection, form.</p> <p>9 MS. HOOD: Object to form.</p> <p>10 A. One thing I'm telling you, it's hard to --</p> <p>11 it's hard to answer the question now because I'm -- I'm</p> <p>12 not in the position to answer it because I have really</p> <p>13 bad situation right now. And that's so hard to</p> <p>14 understand it now because my memory is not working</p> <p>15 about since last month and because of this Lee.</p> <p>16 He give me the hard time. But the name is</p> <p>17 George Lee. He closed my account for three months. I</p> <p>18 was also paying a lot of money for the attorney and I</p> <p>19 couldn't use it at this Frost Bank account. That's why</p> <p>20 there's a lot of stress of these things.</p> <p>21 Q. (BY MR. BALLASES:) Okay. I appreciate --</p> <p>22 A. When I don't feel comfortable, I get tired.</p> <p>23 That's why we make some break to start it over.</p> <p>24 Q. Right. And I'm fine. Like, we've been</p> <p>25 taking breaks --</p>

<p style="text-align: right;">Page 150</p> <p>1 A. Yes. You are very cooperative. But I'm 2 telling you to my position.</p> <p>3 Q. Yeah, I appreciate that.</p> <p>4 A. I like what you're doing --</p> <p>5 Q. Thank you.</p> <p>6 A. -- but I have to answer the question which 7 I'm not able to do it.</p> <p>8 Q. That's okay. All you can do is -- is tell --</p> <p>9 A. Yes.</p> <p>10 Q. -- the truth and that's if it's "I don't 11 know," I don't know.</p> <p>12 A. Yes. Are you going to -- you don't know my 13 position. I know what I'm dealing, that's the main 14 thing.</p> <p>15 Q. Yeah.</p> <p>16 A. That's why I'm telling you, it's too much for 17 me.</p> <p>18 Q. Okay. Well, I'm going to push through fast. 19 We're almost done. We have this --</p> <p>20 A. Okay. Okay.</p> <p>21 Q. -- document and that one and that one's 22 barely --</p> <p>23 A. Thank you. Thank you for being so 24 cooperative. Thank you.</p> <p>25 Q. Sure. If you need a break, just tell me,</p>	<p style="text-align: right;">Page 152</p> <p>1 Q. (BY MR. BALLASES:) Okay. If we turn a little 2 bit further on, it's the same date, I believe -- yeah, 3 right here.</p> <p>4 So there's a check, a few pages beyond what 5 we were just looking at in Exhibit 35. It's also dated 6 February 23rd, 2023, but this particular cashier's 7 check is in the amount of "\$133,717.40"; do you see 8 that?</p> <p>9 A. Yes.</p> <p>10 MR. CHAUDHRI: Objection, form.</p> <p>11 MS. HOOD: Objection, form.</p> <p>12 Q. (BY MR. BALLASES:) Okay. And the "Remitter" 13 is -- it says "Shahnaz Choudhri"; do you see that?</p> <p>14 MR. CHAUDHRI: Objection, form.</p> <p>15 MS. HOOD: Objection, form.</p> <p>16 A. Yes.</p> <p>17 Q. (BY MR. BALLASES:) And it's "Pay to the order 18 of Marilyn Burgess, Harris County District Clerk"; do 19 you see that?</p> <p>20 A. Yes.</p> <p>21 MR. CHAUDHRI: Objection, form.</p> <p>22 MS. HOOD: Object to form.</p> <p>23 Q. (BY MR. BALLASES:) Okay. My question is, and 24 I think I know the answer, but do you have a 25 recollection of why this particular check was written</p>
<p style="text-align: right;">Page 151</p> <p>1 please, and I'm happy to oblige.</p> <p>2 A. Okay. Okay. That's fine.</p> <p>3 Q. Okay. So looking at this check that was 4 dated February 17th of 2023 in the amount of 5 \$1,726,200.14.</p> <p>6 A. Uh-huh.</p> <p>7 Q. It was written out, it says "Pay to the order 8 of: Marilyn Burgess, Harris County District Court." 9 And you at that time in February of 2023, you didn't 10 have any business personally before the Harris County 11 District Court, did you?</p> <p>12 MR. CHAUDHRI: Objection, form.</p> <p>13 MS. HOOD: Object to form.</p> <p>14 A. I don't know.</p> <p>15 Q. (BY MR. BALLASES:) Okay. Do you know -- do 16 you know why this particular check was written?</p> <p>17 MR. CHAUDHRI: Objection, form.</p> <p>18 MS. HOOD: Object to form.</p> <p>19 A. No, I don't remember at all.</p> <p>20 Q. (BY MR. BALLASES:) Okay. Did you -- do you 21 recall instructing your bank to make this cashier's 22 check?</p> <p>23 MS. HOOD: Objection, form.</p> <p>24 MR. CHAUDHRI: Objection, form.</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 153</p> <p>1 from your account to the Harris County District Clerk?</p> <p>2 MR. CHAUDHRI: Objection, form.</p> <p>3 MS. HOOD: Object to form.</p> <p>4 A. No. I don't remember.</p> <p>5 Q. (BY MR. BALLASES:) Okay. Do you have a 6 recollection of instructing your bank, Frost Bank, in 7 February of '23 to prepare this particular cashier's 8 check?</p> <p>9 MR. CHAUDHRI: Objection, form.</p> <p>10 MS. HOOD: Objection, form.</p> <p>11 A. I don't know.</p> <p>12 Q. (BY MR. BALLASES:) Okay. Staying in Exhibit 13 35, and turning a few payments beyond, there's another 14 check, another cashier's check, that was written on the 15 same date, February 23rd, 2023, but it was in the 16 amount of \$200,000. Do you see that?</p> <p>17 A. Yes.</p> <p>18 MR. CHAUDHRI: Objection, form.</p> <p>19 MS. HOOD: Object to form.</p> <p>20 Q. (BY MR. BALLASES:) Okay. And this one, the 21 "Remitter" again, is yourself, it's "Shahnaz Choudhri"; 22 do you see that?</p> <p>23 MR. CHAUDHRI: Objection, form.</p> <p>24 MS. HOOD: Objection, form.</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 154</p> <p>1 Q. (BY MR. BALLASES:) And this time it says "Pay 2 to the order of: Jetall Company"; do you see that? 3 MS. HOOD: Objection, form. 4 MR. CHOUHDRI: Objection, form. 5 Q. (BY MR. BALLASES:) Okay. Can you tell Judge 6 Norman why in February of '23 you wrote a -- or there 7 was a cashier's check from your account to Jetall 8 Company in the amount of \$200,000? 9 MR. CHOUHDRI: Objection, form. 10 MS. HOOD: Objection, form. 11 A. I don't know. 12 Q. (BY MR. BALLASES:) Okay. Did you instruct 13 your bank to create this cashier's check in the amount 14 of \$200,000 or do you recall? 15 MS. HOOD: Object to form. 16 MR. CHOUHDRI: Objection, form. 17 A. No. 18 Q. (BY MR. BALLASES:) Okay. 19 MS. HOOD: No, you don't or no, you 20 don't recall? 21 A. I don't recall. 22 Q. (BY MR. BALLASES:) Stay on Exhibit 35, but we 23 turn to the check that has a date of February 2nd, 24 2024. 25 Okay. So looking at check -- the check dated</p>	<p style="text-align: right;">Page 156</p> <p>1 that page. 2 A. Yeah. 3 Q. It has your signature at the top; is that 4 right? 5 MS. HOOD: Objection, form. 6 MR. CHOUHDRI: Object to form. 7 A. This one? 8 Q. (BY MR. BALLASES:) Yeah. Right there. Is 9 that your signature? 10 MR. CHOUHDRI: Objection, form. 11 MS. HOOD: Object to form. 12 A. I don't know. 13 Q. (BY MR. BALLASES:) Okay. And it says -- it 14 lists an account and it says "Paid to 50BH Acquisition, 15 LLC"; do you see that? 16 MR. CHOUHDRI: Objection, form. 17 A. Yes. 18 Q. (BY MR. BALLASES:) Okay. Do you have any 19 recollection of what 50BH Acquisition, LLC, is? 20 MR. CHOUHDRI: Objection, form. 21 MS. HOOD: Object to form. 22 A. I don't know. 23 Q. (BY MR. BALLASES:) You've never done business 24 with that company, have you? 25 A. I don't know.</p>
<p style="text-align: right;">Page 155</p> <p>1 February 2nd, 2024 in Exhibit 35 in the amount of half 2 a million dollars. Do you see that? 3 MS. HOOD: Objection, form. 4 MR. CHOUHDRI: Object to form. 5 Q. (BY MR. BALLASES:) Okay. This check, it says 6 the "Remitter" it says is -- here it says "Mobeen Naeem 7 Choudhri or Shahnaz Akhter Choudhri"; do you see that? 8 MR. CHOUHDRI: Objection, form. 9 MS. HOOD: Object to form. 10 A. Yes. 11 Q. (BY MR. BALLASES:) Okay. And it says "Pay to 12 the order of" and it lists yourself and Mobeen again. 13 It says "Pay to the order of: Mobeen Choudhri or 14 Shahnaz Akhter Choudhri"; do you see that? 15 MR. CHOUHDRI: Objection, form. 16 MS. HOOD: Objection, form. 17 A. I don't remember. 18 Q. (BY MR. BALLASES:) Okay. But what I -- so 19 you -- as you sit here today, you have no recollection 20 of why this particular check was created? 21 A. Yes. I don't know. 22 MR. CHOUHDRI: Objection, form. 23 MS. HOOD: Objection, form. 24 Q. (BY MR. BALLASES:) Okay. If you look at the 25 reverse side of the check, which is the second image on</p>	<p style="text-align: right;">Page 157</p> <p>1 MR. CHOUHDRI: Objection, form. 2 Q. (BY MR. BALLASES:) Okay. You're not -- you 3 don't have any interest in 50BH Acquisition, LLC, do 4 you? 5 A. I don't know. 6 MR. CHOUHDRI: Objection, form. 7 MS. HOOD: Object to form. 8 A. I don't know. 9 Q. (BY MR. BALLASES:) Okay. Do you have a 10 recollection of ever -- well, strike that. 11 I'm now handing you Exhibit 36 to your 12 deposition. 13 (Exhibit No. 36 marked.) 14 Q. (BY MR. BALLASES:) Okay. Exhibit 36, I will 15 tell you -- you know, we're going to stay on this, 16 but -- okay. 17 Exhibit 36 is a document titled "Certificate 18 of Formation." Do you see that at the top? 19 A. Yeah. 20 MR. CHOUHDRI: Objection, form. 21 Q. (BY MR. BALLASES:) And then it says that the 22 "Entity" is "50BH Acquisition, LLC"; do you see that? 23 A. Yes. 24 MR. CHOUHDRI: Objection, form. 25 MS. HOOD: Object to form.</p>

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1 Q. (BY MR. BALLASES:) Okay. And if you look at 2 the top right, it says this was filed in June of 2023. 3 Do you see that?	1 MS. HOOD: Objection, form. 2 Q. (BY MR. BALLASES:) This is now the second 3 check we've seen for half a million dollars written on 4 this date from yourself to yourself.
4 A. Yes.	5 MS. HOOD: Objection, form. 6 MR. CHAUDHRI: Objection, form.
5 MR. CHAUDHRI: Objection, form.	7 Q. (BY MR. BALLASES:) Do you recall that?
6 Q. (BY MR. BALLASES:) Okay. You were retired at 7 that point --	8 A. Yes.
8 A. I don't know.	9 Q. Okay. And so as you sit here today, it shows 10 -- well, strike that.
9 MR. CHAUDHRI: -- objection, form.	11 As you look at it, it shows the "Remitter" is 12 "Mobeen Naeem Choudhri or Shahnaz Akhter Choudhri"; do 13 you see that?
10 Q. (BY MR. BALLASES:) Okay. And it says the 11 "Manager" is "Shahnaz Choudhri"; do you see that?	14 MR. CHAUDHRI: Objection, form. 15 MS. HOOD: Object to form.
12 MR. CHAUDHRI: Objection, form.	16 A. Yes.
13 Q. (BY MR. BALLASES:) At the bottom?	17 Q. (BY MR. BALLASES:) Okay. And the "Payee," 18 pay to the order of, is either "Mobeen Naeem Choudhri 19 or Shahnaz Akhter Choudhri"; do you see that?
14 A. Yes.	20 A. Yes.
15 Q. Do you have any recollection of ever creating 16 a company called 50BH Acquisition, LLC?	21 MR. CHAUDHRI: Objection, form. 22 MS. HOOD: Object to form.
17 A. I don't remember.	23 Q. (BY MR. BALLASES:) Okay. Do you have 24 recollection of instructing your bank to make this 25 cashier's check in February of 2024 for half a million
18 MR. CHAUDHRI: Objection, form.	
19 MS. HOOD: Object to form.	
20 Q. (BY MR. BALLASES:) Did you ever authorize 21 anybody to create this company and list yourself as a 22 manager?	
23 A. I don't know.	
24 MR. CHAUDHRI: Objection, form.	
25 MS. HOOD: Object to form.	
Page 159	Page 161
1 Q. (BY MR. BALLASES:) Okay. I'm going to point 2 you, still on Exhibit 35, I'm going to point you to 3 another check that was dated February 2nd of 2024. 4 Okay. So we're still on Exhibit 35, we're 5 now looking at another check that was written in 6 February --	1 dollars? 2 MS. HOOD: Object to form. 3 MR. CHAUDHRI: Objection, form.
7 A. This is the same check you show me before?	4 A. Yes.
8 MR. CHAUDHRI: Objection, form.	5 Q. (BY MR. BALLASES:) You do have a 6 recollection?
9 Q. (BY MR. BALLASES:) No. It's actually not. 10 If you look at the check number, I was going to 11 specify the check number this time because it is 12 different.	7 A. No.
13 So if you look, there are several 14 half-a-million-dollar checks made the same date, so 15 here's 833, there's 834.	8 Q. So do you recall telling the bank -- 9 MR. CHAUDHRI: Objection, form.
16 A. Okay. That's fine.	10 Q. (BY MR. BALLASES:) -- to make this check?
17 Q. Okay.	11 A. No.
18 A. I don't remember at all.	12 MR. CHAUDHRI: Objection, form. 13 MS. HOOD: Object to form.
19 Q. That's okay. Okay.	14 A. I think I have a problem with the banker with 15 --
20 A. Okay.	16 MR. CHAUDHRI: Objection, form.
21 Q. So looking at the February 2nd, 2024 check, 22 which is Check No. 569008834, it's in the amount of 23 \$500,000. Do you see that?	17 A. -- George Lee.
24 A. Yes.	18 Q. (BY MR. BALLASES:) Okay.
25 MR. CHAUDHRI: Objection, form.	19 A. He's giving me too much confusion. He give 20 me a hard time. I don't -- on that time, there was 21 something going wrong.
	22 Q. Okay.
	23 A. I don't know what's going on. I don't 24 remember.
	25 Q. That's okay. If we look here on this check

<p style="text-align: right;">Page 162</p> <p>1 also at the reverse side of the check on the bottom 2 image, it says -- it's got your signature on it. Do 3 you see that?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And then it says paid to "50BH 6 Acquisition, LLC"; do you see that?</p> <p>7 MR. CHAUDHRI: Objection, form.</p> <p>8 A. Yes.</p> <p>9 Q. (BY MR. BALLASES:) Okay. Can you tell the 10 Court why this 50 -- this half a million dollars was 11 paid to BH Acquisition, LLC?</p> <p>12 MR. CHAUDHRI: Objection, form.</p> <p>13 MS. HOOD: Objection, form.</p> <p>14 A. I don't know.</p> <p>15 Q. (BY MR. BALLASES:) Okay. Let me see how to 16 best do this. Okay. I'm going to ask you to -- I've 17 done a poor job making this clear so I want to clear 18 this up.</p> <p>19 So one of the first -- one of the earlier 20 check we looked at today was one of the 21 half-million-dollar checks written on February 2nd of 22 2024 from yourself to yourself and it has the "Pay to: 23 50BH Acquisition"; do you see that?</p> <p>24 A. Yes.</p> <p>25 MS. HOOD: Object to form.</p>	<p style="text-align: right;">Page 164</p> <p>1 569008833. Do you see that?</p> <p>2 A. Yes.</p> <p>3 MR. CHAUDHRI: Objection, form.</p> <p>4 MS. HOOD: Object to form.</p> <p>5 Q. (BY MR. BALLASES:) Okay. So that's a third 6 check that we've looked at in the same amount on the 7 same date. And then the final check in that amount 8 that we see, that we just spoke about, is also dated, 9 same date, February 2nd, 2024, same amount, half a 10 million dollars. The "Remitter" is yourself from your 11 account, "Payee" is yourself and it says "Paid to 50BH 12 Acquisitions, LLC."</p> <p>13 MR. CHAUDHRI: Objection, form.</p> <p>14 MS. HOOD: Objection, form.</p> <p>15 I'm also going to object to the sidebar 16 commentary and testimony about what the checks are.</p> <p>17 Q. (BY MR. BALLASES:) Okay. And so this check 18 number is 569008834. Do you see that?</p> <p>19 A. Yes.</p> <p>20 MR. CHAUDHRI: Objection, form.</p> <p>21 MS. HOOD: Objection, form.</p> <p>22 Q. (BY MR. BALLASES:) Okay. So that's four 23 checks each in the amount of half a million dollars to 24 BH Acquisitions, LLC, written on the same date, 25 February 2nd of 2024. Do you have a recollection of</p>
<p style="text-align: right;">Page 163</p> <p>1 MR. CHAUDHRI: Objection, form.</p> <p>2 Q. (BY MR. BALLASES:) The first check I see has 3 the Check No. 569008832; do you see that?</p> <p>4 A. Yes.</p> <p>5 MS. HOOD: Object to form.</p> <p>6 MR. CHAUDHRI: Objection, form.</p> <p>7 Q. (BY MR. BALLASES:) Okay. Then we flip a 8 little bit further, we see a second -- in that same 9 exhibit, Exhibit 35, we see a second check, same date, 10 same amount, same remitter, same payee, half a million 11 dollars, but this one is -- and it's paid to BH 50 12 Acquisition, LLC, but this one is Check No. 569008835. 13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 MR. CHAUDHRI: Objection, form.</p> <p>16 MS. HOOD: Objection, form.</p> <p>17 Q. (BY MR. BALLASES:) Okay. So that's a second 18 one. And then if we flip a few pages further, we see 19 another half-million-dollar check, same date, February 20 2nd, 2024. The "Remitter" is yourself, this account, 21 and you're paying to yourself and it says "Paid to: 22 50BH Acquisitions, LLC"; do you see that?</p> <p>23 MR. CHAUDHRI: Objection, form.</p> <p>24 MS. HOOD: Object to form.</p> <p>25 Q. (BY MR. BALLASES:) But this one is Check No.</p>	<p style="text-align: right;">Page 165</p> <p>1 why those checks were written?</p> <p>2 MR. CHAUDHRI: Objection, form.</p> <p>3 MS. HOOD: Object to form.</p> <p>4 A. I don't know.</p> <p>5 Q. (BY MR. BALLASES:) Okay. Bear with me. 6 Okay. Sorry about that.</p> <p>7 Still looking at Exhibit 35 to your 8 deposition, there's another check that is Check No. 9 569008836.</p> <p>10 MR. CHAUDHRI: Objection, form.</p> <p>11 Q. (BY MR. BALLASES:) It's dated February 2nd of 12 2024, it's in the amount of 300,000. Do you see that?</p> <p>13 A. Yes.</p> <p>14 MR. CHAUDHRI: Objection, form.</p> <p>15 Q. (BY MR. BALLASES:) Okay. And the "Remitter" 16 is from your account. It says "Mobeen Naeem Choudhri 17 or Shahnaz Akhter Choudhri"; do you see that?</p> <p>18 A. Yes.</p> <p>19 MS. HOOD: Objection, form.</p> <p>20 MR. CHAUDHRI: Objection, form.</p> <p>21 Q. (BY MR. BALLASES:) "Payee" is the same 22 people. It's "Mobeen Naeem Choudhri or Shahnaz Akhter 23 Choudhri." Do you see that?</p> <p>24 A. Yes.</p> <p>25 MR. CHAUDHRI: Objection, form.</p>

<p style="text-align: right;">Page 166</p> <p>1 MS. HOOD: Objection, form.</p> <p>2 Q. (BY MR. BALLASES:) And if you look at the</p> <p>3 back of the check, which is the image below, on that</p> <p>4 same page, it's got your signature?</p> <p>5 A. Yes.</p> <p>6 MR. CHAUDHRI: Objection, form.</p> <p>7 MS. HOOD: Object to form.</p> <p>8 Q. (BY MR. BALLASES:) Okay. And this one also</p> <p>9 says "Paid to: 50BH Acquisitions, LLC"; do you see</p> <p>10 that?</p> <p>11 MR. CHAUDHRI: Objection, form.</p> <p>12 MS. HOOD: Object to form.</p> <p>13 A. Yes. I don't know.</p> <p>14 Q. (BY MR. BALLASES:) Okay. This one's but</p> <p>15 300,000 so it's less. And so do you have any</p> <p>16 recollection as to why you're pulling this money out of</p> <p>17 your account in February of 2024 to pay BH</p> <p>18 Acquisitions, LLC?</p> <p>19 MR. CHAUDHRI: Objection, form.</p> <p>20 MS. HOOD: Objection, form.</p> <p>21 A. I don't know. I don't remember.</p> <p>22 Q. (BY MR. BALLASES:) Do you have a</p> <p>23 recollection -- do you remember instructing your bank</p> <p>24 to make this cashier's check?</p> <p>25 A. I don't.</p>	<p style="text-align: right;">Page 168</p> <p>1 people. It's either "Mobeen Naeem Choudhri or Shahnaz</p> <p>2 Akhter Choudhri"; do you see that?</p> <p>3 MR. CHAUDHRI: Objection, form.</p> <p>4 A. Yes.</p> <p>5 Q. (BY MR. BALLASES:) Okay. And if look at the</p> <p>6 back side of the check, the image beneath it, it shows</p> <p>7 it's signed by you; is that right?</p> <p>8 A. Yes.</p> <p>9 MR. CHAUDHRI: Objection, form.</p> <p>10 MS. HOOD: Object to form.</p> <p>11 Q. (BY MR. BALLASES:) But I know you don't</p> <p>12 remember signing it, but do you recall if that's your</p> <p>13 -- or can you see that that's your signature?</p> <p>14 A. I don't remember.</p> <p>15 MR. CHAUDHRI: Objection, form.</p> <p>16 MS. HOOD: Object to form.</p> <p>17 Q. (BY MR. BALLASES:) Okay. And, see, it says</p> <p>18 "Paid to: 50BH Acquisitions, LLC"?</p> <p>19 A. No.</p> <p>20 MR. CHAUDHRI: Objection, form.</p> <p>21 Q. (BY MR. BALLASES:) Do you see that right</p> <p>22 there? It says "Paid to: 50" --</p> <p>23 A. I don't remember.</p> <p>24 MS. HOOD: Objection, form.</p> <p>25 MR. CHAUDHRI: Objection, form.</p>
<p style="text-align: right;">Page 167</p> <p>1 MR. CHAUDHRI: Objection, form.</p> <p>2 MS. HOOD: Objection, form. Asked and</p> <p>3 answered.</p> <p>4 Q. (BY MR. BALLASES:) Okay. And then if we</p> <p>5 turn, staying within Exhibit 35, if we turn to Check</p> <p>6 No. 569008837. Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. This is the another check dated</p> <p>9 February 2nd of 2024.</p> <p>10 MR. CHAUDHRI: Objection, form.</p> <p>11 MS. HOOD: Object to form.</p> <p>12 Q. (BY MR. BALLASES:) Do you see it?</p> <p>13 A. Yes.</p> <p>14 MR. CHAUDHRI: Objection, form.</p> <p>15 Q. (BY MR. BALLASES:) Okay. It's in the amount</p> <p>16 of \$200,000?</p> <p>17 MR. CHAUDHRI: Objection, form.</p> <p>18 MS. HOOD: Object to form.</p> <p>19 Q. (BY MR. BALLASES:) Okay. And, again, the</p> <p>20 "Remitter" so this account, so it's yourself or Mobeen</p> <p>21 Naeem Choudhri. Do you see that?</p> <p>22 MR. CHAUDHRI: Objection, form.</p> <p>23 MS. HOOD: Objection, form.</p> <p>24 A. Yes.</p> <p>25 Q. (BY MR. BALLASES:) Okay. "Payee" is the same</p>	<p style="text-align: right;">Page 169</p> <p>1 Q. (BY MR. BALLASES:) I know you don't remember.</p> <p>2 But I'm asking if you see -- do you see here, it says</p> <p>3 "50BH Acquisitions, LLC"?</p> <p>4 A. Yes.</p> <p>5 MR. CHAUDHRI: Objection, form.</p> <p>6 MS. HOOD: Object to form.</p> <p>7 Q. (BY MR. BALLASES:) So this is another</p> <p>8 \$200,000 paid to that particular business on the same</p> <p>9 date, February 2nd, 2024.</p> <p>10 MR. CHAUDHRI: Objection, form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. BALLASES:) Can you tell the Judge why</p> <p>13 all of these checks are being written on the same date</p> <p>14 for, I think it's 2.5 million now?</p> <p>15 MS. HOOD: Object to form.</p> <p>16 MR. CHAUDHRI: Objection, form.</p> <p>17 A. Yes. I can't -- don't recognize these</p> <p>18 things.</p> <p>19 Q. (BY MR. BALLASES:) Okay. Can you even -- do</p> <p>20 you know if you instructed the bank to prepare that</p> <p>21 check?</p> <p>22 A. I don't know.</p> <p>23 MR. CHAUDHRI: Objection, form.</p> <p>24 MS. HOOD: Object to form.</p> <p>25 Q. (BY MR. BALLASES:) Okay. If we stay on this</p>

<p style="text-align: right;">Page 170</p> <p>1 exhibit, but we turn to Check No. -- I was on it.</p> <p>2 So if we stay on Exhibit 35, but we turn to</p> <p>3 Check No. 569008838. Do you see that page?</p> <p>4 MR. CHAUDHRI: Objection, form.</p> <p>5 A. Yes.</p> <p>6 MS. HOOD: Object to form.</p> <p>7 Q. (BY MR. BALLASES:) Okay. This is another</p> <p>8 check that's dated February 2nd, 2024. Do you see</p> <p>9 that?</p> <p>10 A. Yes.</p> <p>11 MR. CHAUDHRI: Objection, form.</p> <p>12 MS. HOOD: Objection, form.</p> <p>13 Q. (BY MR. BALLASES:) Okay. And the date is --</p> <p>14 or excuse me. The amount is \$200,000?</p> <p>15 MR. CHAUDHRI: Objection, form.</p> <p>16 A. Yes.</p> <p>17 Q. (BY MR. BALLASES:) Do you see that?</p> <p>18 MR. CHAUDHRI: Objection, form.</p> <p>19 A. Yes.</p> <p>20 Q. (BY MR. BALLASES:) And "Remitter" is, again,</p> <p>21 it's this account. So it's "Mobeen Naeem Choudhri or</p> <p>22 Shahnaz Akhter Choudhri"; do you see that?</p> <p>23 MR. CHAUDHRI: Objection, form.</p> <p>24 A. There's an objection so I don't want to</p> <p>25 answer it.</p>	<p style="text-align: right;">Page 172</p> <p>1 Q. (BY MR. BALLASES:) Okay. And it says "Pay</p> <p>2 to: 50" -- "Pay to: 50BH" --</p> <p>3 MR. CHAUDHRI: Objection, form.</p> <p>4 Q. (BY MR. BALLASES:) -- "Acquisitions, LLC"?</p> <p>5 A. Yes.</p> <p>6 MR. CHAUDHRI: Objection, form.</p> <p>7 Q. (BY MR. BALLASES:) Okay. So this is another</p> <p>8 200,000 paid on that same date to this particular</p> <p>9 entity. Do you see that?</p> <p>10 MR. CHAUDHRI: Objection, form.</p> <p>11 A. Yes.</p> <p>12 MS. HOOD: Object to form.</p> <p>13 Q. (BY MR. BALLASES:) Can you tell the Judge why</p> <p>14 all these checks are being written on the same date</p> <p>15 in -- some in differing amounts, some in the same</p> <p>16 amounts to be paid to 50BH Acquisition, LLC?</p> <p>17 MR. CHAUDHRI: Objection to form.</p> <p>18 MS. HOOD: Object to form.</p> <p>19 A. Yes. I don't want to -- I don't know. I</p> <p>20 don't know anything about it.</p> <p>21 Q. (BY MR. BALLASES:) Okay. And that's because</p> <p>22 you've never done any work with --</p> <p>23 A. Okay.</p> <p>24 MR. CHAUDHRI: Objection, form.</p> <p>25 Q. (BY MR. BALLASES:) -- 50BH Acquisitions; is</p>
<p style="text-align: right;">Page 171</p> <p>1 Q. (BY MR. BALLASES:) I know. They can object</p> <p>2 to the form which means they don't like my question,</p> <p>3 but you still have to answer it.</p> <p>4 MR. CHAUDHRI: Objection, form.</p> <p>5 MS. HOOD: Thanks to the Judge, but go</p> <p>6 ahead.</p> <p>7 Q. (BY MR. BALLASES:) So you see the "Remitter"</p> <p>8 of the check is either "Shahnaz Akhter Choudhri or</p> <p>9 Mobeen Naeem Choudhri." It's from your Frost account.</p> <p>10 MR. CHAUDHRI: Objection, form.</p> <p>11 MS. HOOD: Objection, form.</p> <p>12 Q. (BY MR. BALLASES:) Okay.</p> <p>13 MS. HOOD: And objection to the</p> <p>14 statement that it's from her Frost account.</p> <p>15 Q. (BY MR. BALLASES:) Okay. And you see it says</p> <p>16 "Pay to the order of: Mobeen Naeem Choudhri or Shahnaz</p> <p>17 Akhter Choudhri"?</p> <p>18 MR. CHAUDHRI: Objection, form.</p> <p>19 MS. HOOD: Object to form.</p> <p>20 A. Yes.</p> <p>21 Q. (BY MR. BALLASES:) Okay. And if you look at</p> <p>22 the reverse side of the check, again, it has your</p> <p>23 signature?</p> <p>24 MS. HOOD: Object to form.</p> <p>25 MR. CHAUDHRI: Objection, form.</p>	<p style="text-align: right;">Page 173</p> <p>1 that right?</p> <p>2 A. Okay. I don't know.</p> <p>3 MS. HOOD: Object to form.</p> <p>4 A. No. No.</p> <p>5 MS. HOOD: It's because she doesn't</p> <p>6 remember.</p> <p>7 MR. BALLASES: Okay.</p> <p>8 MS. HOOD: How many times does she</p> <p>9 have to tell you?</p> <p>10 MR. BALLASES: Objection, sidebar.</p> <p>11 Q. (BY MR. BALLASES:) Okay. So if we turn to</p> <p>12 exhibit -- staying on Exhibit 35, but turning to Check</p> <p>13 No. 569008839. Do you see that check?</p> <p>14 A. Yes.</p> <p>15 MR. CHAUDHRI: Objection, form.</p> <p>16 MS. HOOD: Objection, form.</p> <p>17 Q. (BY MR. BALLASES:) Okay. This is another</p> <p>18 check also written on February 2nd of 2024. Do you see</p> <p>19 that?</p> <p>20 A. Yes.</p> <p>21 MS. HOOD: Object to form.</p> <p>22 Q. (BY MR. BALLASES:) Okay. And this one is</p> <p>23 written in the amount of \$200,000. Do you see that?</p> <p>24 A. Yes.</p> <p>25 MS. HOOD: Object to form.</p>

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1	Q. (BY MR. BALLASES:) Okay. Again, the	1	remember or you don't know?
2	"Remitter" is yourself or Mobeen Naeem Choudhri. Do	2	THE WITNESS: I don't remember.
3	you see that?	3	MR. BALLASES: Objection to sidebar.
4	A. Yes.	4	THE WITNESS: That's the same thing.
5	MS. HOOD: Object to form.	5	I don't know.
6	Q. (BY MR. BALLASES:) Okay. And the pay is --	6	MS. HOOD: Thank you.
7	"Pay to the order of," it's yourself Shahnaz Akhter	7	THE WITNESS: I don't know --
8	Choudhri or Mobeen Naeem Choudhri. Do you see that?	8	MS. HOOD: That's not a sidebar.
9	MR. CHAUDHRI: Objection, form.	9	THE WITNESS: That's for the same
10	MS. HOOD: Objection, form.	10	thing.
11	A. I don't know about anything.	11	MS. HOOD: I'm allowed to clarify her
12	Q. (BY MR. BALLASES:) Okay. And if you look on	12	testimony.
13	the reverse side of it, it was signed by you, correct?	13	Q. (BY MR. BALLASES:) Okay. I'm now going to
14	MS. HOOD: Object to form.	14	hand you Exhibit 37 to your deposition.
15	Q. (BY MR. BALLASES:) Is that right?	15	(Exhibit No. 37 marked.)
16	A. I don't know.	16	Q. (BY MR. BALLASES:) Here you go. I'll put
17	MR. CHAUDHRI: Objection, form.	17	this right there. Exhibit 37.
18	Q. (BY MR. BALLASES:) Do you recognize your	18	Okay. So Exhibit 37 to your deposition are
19	signature at the bottom --	19	deposit slips from your Frost Bank account. Do you see
20	A. I'm not sure.	20	that?
21	MR. CHAUDHRI: Objection, form.	21	A. Yes.
22	MS. HOOD: Object to form.	22	MS. HOOD: Object to form. Object to
23	A. I don't recognize anything.	23	the statement that and the testimony that it's from her
24	Q. (BY MR. BALLASES:) You don't recognize your	24	Frost Bank account. There's been no, absolutely no --
25	signature?	25	MR. BALLASES: Okay. You stated your
Page 175		Page 177	
1	A. I don't.	1	objection.
2	MR. CHAUDHRI: Objection, form.	2	MS. HOOD: -- foundation --
3	MS. HOOD: Object to form.	3	MR. BALLASES: You don't need to give
4	Q. (BY MR. BALLASES:) And then do you see	4	sidebar.
5	beneath that, it says "Paid to: 50BH Acquisitions,	5	MS. HOOD: -- to this document.
6	LLC"?	6	MR. BALLASES: Okay.
7	MR. CHAUDHRI: Objection, form.	7	MS. HOOD: Yes, I do. Because you
8	MS. HOOD: Same objection.	8	keep doing it. So stop doing it.
9	A. Okay. I don't know.	9	MR. BALLASES: Okay. Do you know how
10	Q. (BY MR. BALLASES:) Okay. But do you see it	10	the Rules work? I mean, do you want to get your client
11	says that?	11	sanctioned again?
12	A. Yes.	12	MS. HOOD: I do know how the Rules
13	Q. Okay.	13	work.
14	MR. CHAUDHRI: Objection, form.	14	MR. BALLASES: I hope you paid her
15	MS. HOOD: Objection, form.	15	sanctions before --
16	Q. (BY MR. BALLASES:) My question is again, do	16	MS. HOOD: I also know --
17	you have any recollection of why all these checks are	17	MR. BALLASES: -- because she
18	being written on the same day in differing amounts to	18	shouldn't have.
19	yourself and then being paid to some other company?	19	MS. HOOD: I also -- I object to the
20	MS. HOOD: Objection, form.	20	sidebar there.
21	MR. CHAUDHRI: Objection, form.	21	MR. BALLASES: Okay.
22	A. No. I don't want to know. I don't know	22	MS. HOOD: -- I also note that in your
23	about anything.	23	question is a representation that's not correct.
24	Q. (BY MR. BALLASES:) Okay.	24	MR. BALLASES: All right.
25	MS. HOOD: Is that because you don't	25	(Parties continue speaking simultaneously.)

<p style="text-align: right;">Page 178</p> <p>1 Q. (BY MR. BALLASES:) Okay. So looking at 2 Exhibit 37, if you turn to -- if you turn to the 3 deposit slip that is 68094, which I will pull for you. 4 Okay. So within Exhibit 37 there's a deposit 5 slip marked 68094. Do you see that -- 6 MR. CHAUDHRI: Objection, form. 7 MS. HOOD: -- objection, form. 8 A. Yes. 9 Q. (BY MR. BALLASES:) -- okay. Do you see it? 10 MR. CHAUDHRI: Objection, form. 11 MS. HOOD: Object to form. 12 A. Yes. 13 Q. (BY MR. BALLASES:) Okay. And this is -- it 14 looks like a check to the -- from -- excuse me -- 15 "Transact Title Galleria." Do you see that at the top 16 left? 17 MS. HOOD: Objection, form. 18 MR. CHAUDHRI: Objection, form. 19 A. Yes. 20 Q. (BY MR. BALLASES:) Okay. And it says "Paid 21 to: Ali Choudhri." Do you see that? 22 A. Yes. 23 MS. HOOD: Objection, form. 24 MR. CHAUDHRI: Objection, form. 25 Q. (BY MR. BALLASES:) Okay. And it's in the</p>	<p style="text-align: right;">Page 180</p> <p>1 MR. CHAUDHRI: Objection, form. 2 A. I don't know. 3 MS. HOOD: Also asked her a legal 4 conclusion. 5 Q. (BY MR. BALLASES:) Okay. 6 A. I know my son. He's not doing that wrong, 7 anything. 8 Q. If you turn to -- let's see, deposit slip 9 that's dated March 15th of 2024. Here we go. 10 So Exhibit 37, looking at the deposit slip 11 that's dated March 15th, 2024. Do you see that? 12 A. Yes. 13 MR. CHAUDHRI: Objection, form. 14 MS. HOOD: Object to form. 15 Q. (BY MR. BALLASES:) Okay. This shows that it 16 says the -- well, strike that. 17 It shows a 140 -- excuse me -- strike that. 18 It says a \$14,000 cash deposit into that 19 account. Do you have any recollection -- 20 MR. CHAUDHRI: Objection, form. 21 MS. HOOD: Form. 22 Q. (BY MR. BALLASES:) -- of depositing cash 23 within this account? 24 MS. HOOD: Form. 25 A. Yes.</p>
<p style="text-align: right;">Page 179</p> <p>1 amount of \$82,786.96. Do you see that? 2 A. Yes. 3 MS. HOOD: Form. 4 MR. CHAUDHRI: Objection, form. 5 Q. (BY MR. BALLASES:) And the date is February 6 1st of 2021. Do you see that? 7 A. Yes. 8 MS. HOOD: Form. 9 MR. CHAUDHRI: Objection, form. 10 Q. (BY MR. BALLASES:) Okay. And you see on the 11 reverse page, it was signed -- it says, I think, 12 "S. Choudhri" there? 13 MS. HOOD: Form. 14 MR. CHAUDHRI: Objection, form. 15 Q. (BY MR. BALLASES:) Can you tell the Court why 16 Mr. Choudhri was depositing -- Mr. Ali Choudhri was 17 deposition \$82,786.96 into your account at Frost Bank? 18 MR. CHAUDHRI: Objection, form. 19 MS. HOOD: Form. 20 A. I don't remember at all. 21 Q. (BY MR. BALLASES:) Okay. If Mr. Choudhri was 22 trying to hide money from creditors, would it make 23 sense for him to deposit the funds into this account in 24 the name of his mom and sister? 25 MS. HOOD: Object to form.</p>	<p style="text-align: right;">Page 181</p> <p>1 Q. (BY MR. BALLASES:) Okay. What can you tell 2 me about the deposit of 14,000 cash? 3 MS. HOOD: Form. 4 MR. CHAUDHRI: Objection, form. 5 A. I don't remember. 6 Q. (BY MR. BALLASES:) Okay. You don't remember. 7 A. And the one thing, is my son is not hiding 8 money anywhere. He is doing everything okay. And I 9 have a problem, the memory. Otherwise, I'm doing the 10 same thing and I would do it all. 11 Q. Okay. 12 A. The only thing, I'm not in the position to 13 answer the question because I'm not in good shape. 14 Q. I appreciate that and we're almost done. 15 If we turn, staying within Exhibit 37, but we 16 turn to -- Okay. So looking at towards the back of 17 Exhibit 37, there is a -- looks like a cashier's check. 18 It's number -- Cashier's Check No. 569009012. Do you 19 see that? 20 MS. HOOD: Form. 21 MR. CHAUDHRI: Objection, form. 22 A. Yes. 23 Q. (BY MR. BALLASES:) Okay. And it shows that 24 this a -- the "Remitter" is yourself, "Shahnaz A. 25 Choudhri." Do you see that?</p>

<p style="text-align: right;">Page 182</p> <p>1 MS. HOOD: Objection, form. 2 MR. CHAUDHRI: Objection, form. 3 Q. (BY MR. BALLASES:) Okay. And this is "Pay to 4 the order of: JLM Law, PLLC, Jennifer MacGeorge"; do 5 you see that? 6 A. Yes. 7 MR. CHAUDHRI: Objection, form. 8 MS. HOOD: Form. 9 Q. (BY MR. BALLASES:) Okay. Can you -- and it's 10 dated April 2nd of 2024. Do you see that? 11 MS. HOOD: Form. 12 MR. CHAUDHRI: Objection, form. 13 A. Yes. 14 Q. (BY MR. BALLASES:) Okay. Can you tell the 15 Court why you were paying \$50,000 in April of 2024 16 for -- or to Jennifer MacGeorge? 17 MS. HOOD: Form. 18 MR. CHAUDHRI: Objection, form. 19 A. I know, but I don't remember it. 20 Q. (BY MR. BALLASES:) So do you remember why -- 21 A. No. I said I don't remember it. I know this 22 one is this, but I don't remember when it happened. 23 Q. Yeah. You've, I think, told us that you've 24 never hired Jennifer MacGeorge as your attorney? 25 A. Yes.</p>	<p style="text-align: right;">Page 184</p> <p>1 Q. (BY MR. BALLASES:) Okay. And it says it's 2 "Paid to the order" of yourself, "Shahnaz Akhter 3 Choudhri." Do you see that? 4 MS. HOOD: Objection, form. 5 A. Yes. 6 Q. (BY MR. BALLASES:) Okay. And the amount is 7 \$100,000? 8 A. Yes. 9 MS. HOOD: Form. 10 MR. CHAUDHRI: Objection, form. 11 Q. (BY MR. BALLASES:) Okay. Dated April 24th, 12 of 2024 -- 13 A. I don't recognize anything. 14 MS. HOOD: Form. 15 MR. CHAUDHRI: Objection, form. 16 A. I don't know what's going on. 17 Q. (BY MR. BALLASES:) Okay. Let me finish the 18 statement -- the question. 19 So the check is dated April 24th, 2024. Do 20 you see that? 21 A. Yes. 22 MR. CHAUDHRI: Objection, form. 23 MS. HOOD: Objection, form. 24 Q. (BY MR. BALLASES:) Okay. I think I know what 25 you're going to say, but could you tell the Court why</p>
<p style="text-align: right;">Page 183</p> <p>1 MS. HOOD: Form. 2 A. No. 3 Q. (BY MR. BALLASES:) That's right? Have you 4 ever hired Jennifer MacGeorge as an attorney? 5 A. No. I don't know. 6 MS. HOOD: Form. 7 A. I don't remember. 8 Q. (BY MR. BALLASES:) Is the only attorney 9 you've ever hired Ms. Lori Hood that's here today? 10 A. I don't remember. I don't remember. 11 Q. Okay. Turn to looks like the last page of 12 Exhibit 37. Yes. 13 Okay. If we turn to the last page of Exhibit 14 37. 15 A. Uh-huh. 16 Q. It shows an official check from Metro City 17 Bank, Check No. 1800000023. Do you see that? 18 A. Yes. 19 MR. CHAUDHRI: Objection, form. 20 Q. (BY MR. BALLASES:) Okay. And it shows the 21 "Remitter" is "50BH Acquisitions, LLC"; do you see 22 that? 23 A. Yes. 24 MR. CHAUDHRI: Objection, form. 25 MS. HOOD: Form.</p>	<p style="text-align: right;">Page 185</p> <p>1 you're getting \$100,000 in April of '24 from 50BH 2 Acquisition, LLC -- 3 A. I don't know. 4 MS. HOOD: -- form and sidebar. 5 MR. CHAUDHRI: Objection, form. 6 Q. (BY MR. BALLASES:) Okay. As we sit here 7 today, we've talked about this Frost Bank account of 8 yours and your daughter Mobeen and we've seen, you 9 know, and I'm ballparking this, but transactions 10 exceeding -- exceeding \$6 million go out of this 11 account in the last few years. 12 And as I understand your testimony, you 13 cannot tell us -- you do not recall what any of those 14 transfers pertain to; is that right? 15 MR. CHAUDHRI: Objection, form. 16 MS. HOOD: Object to the form and I 17 object to the sidebar and object to the testimony and 18 her -- you misrepresenting her testimony. 19 Q. (BY MR. BALLASES:) Is that right, ma'am? 20 MR. CHAUDHRI: Objection, form. 21 A. Yes. I only know -- 22 MR. CHAUDHRI: Objection, form. 23 A. -- I owe (sic) the money to my daughter and 24 she's returning, but she's not authorized to sign in my 25 account, in this one. But she's also, we are trying</p>

<p>Page 186</p> <p>1 to, but she's not authorized on this account and she 2 pay me the money, whatever I loan it.</p> <p>3 MR. CHAUDHRI: Objection, form.</p> <p>4 Q. (BY MR. BALLASES:) Okay. So regarding all 5 these transfers regarding real property, you -- even 6 though it's in excess of \$6 million, you can't tell us 7 what those pertain to?</p> <p>8 MR. CHAUDHRI: Objection, form.</p> <p>9 MS. HOOD: Object to form. Object to the 10 misrepresentation of her testimony. She says she 11 doesn't remember, not she can't tell you.</p> <p>12 MR. BALLASES: Thank you.</p> <p>13 Q. (BY MR. BALLASES:) And if we look at the 14 wires that were made into your Frost Bank account --</p> <p>15 A. One thing --</p> <p>16 MS. HOOD: Huh-uh, huh-uh. Don't --</p> <p>17 MR. CHAUDHRI: There's no question on 18 the table.</p> <p>19 MS. HOOD: Don't say anything.</p> <p>20 THE WITNESS: Okay.</p> <p>21 Q. (BY MR. BALLASES:) So if we look at Exhibit 22 33, which are the wires into your Frost Bank account, 23 we see in excess of \$14 million wired into this account 24 over the last several years. And you can not tell us, 25 as you sit here today, why those wires were made into</p>	<p>Page 188</p> <p>1 MR. CHAUDHRI: Objection, form.</p> <p>2 Q. (BY MR. BALLASES:) -- such that you filed an 3 income tax return?</p> <p>4 A. I don't remember.</p> <p>5 MS. HOOD: Form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. What about if I 7 asked you that same question from 2020 through 2023 if 8 you -- if you earned income and filed a tax return, 9 would your answer be the same?</p> <p>10 MS. HOOD: Form.</p> <p>11 MR. CHAUDHRI: Objection, form.</p> <p>12 A. Yes.</p> <p>13 Q. (BY MR. BALLASES:) Okay. I think I recall 14 you telling me when you do file tax returns, you do it 15 at Anderson Tax; is that right --</p> <p>16 A. Yes.</p> <p>17 MR. CHAUDHRI: -- objection, form.</p> <p>18 MS. HOOD: Form.</p> <p>19 Q. (BY MR. BALLASES:) As you sit here today, can 20 you tell us your primary bank that you bank at --</p> <p>21 A. I don't know.</p> <p>22 MS. HOOD: -- form.</p> <p>23 MR. CHAUDHRI: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) Do you have a recollection 25 of any other bank accounts in which money from</p>
<p>Page 187</p> <p>1 this account, can you?</p> <p>2 MS. HOOD: Objection, form.</p> <p>3 MR. CHAUDHRI: Objection, form.</p> <p>4 MS. HOOD: Objection to the 5 misrepresentation of her testimony.</p> <p>6 MR. CHAUDHRI: Asked and answered.</p> <p>7 A. I don't know. I've already explain to you.</p> <p>8 Q. (BY MR. BALLASES:) Okay.</p> <p>9 A. And you'll notice --</p> <p>10 MS. HOOD: Huh-uh, huh-uh. Don't --</p> <p>11 MR. CHAUDHRI: Objection. There's no 12 question on the table.</p> <p>13 Q. (BY MR. BALLASES:) So when we spoke in your 14 last deposition, you talked to me about that you filed 15 income tax returns. Do you remember that?</p> <p>16 A. Yes.</p> <p>17 MR. CHAUDHRI: Objection, form.</p> <p>18 Q. (BY MR. BALLASES:) Okay. So in -- in 2018, 19 did you have income such that you filed an income tax 20 return?</p> <p>21 A. I don't remember.</p> <p>22 MS. HOOD: Object to form.</p> <p>23 MR. CHAUDHRI: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) Okay. What about in 2019, 25 did you have income --</p>	<p>Page 189</p> <p>1 Mr. Choudhri's business endeavors have gone into that 2 account?</p> <p>3 A. I don't know.</p> <p>4 MS. HOOD: Objection, form.</p> <p>5 Q. (BY MR. BALLASES:) Do you have any 6 recollection of another bank account that we haven't 7 discussed in which you were the owner of the account 8 and monies are going out to pay for Mr. Ali Choudhri's 9 business endeavors?</p> <p>10 MR. CHAUDHRI: Objection, form.</p> <p>11 MS. HOOD: Form.</p> <p>12 A. I don't know.</p> <p>13 MR. BALLASES: Okay. Okay. Well, 14 Ms. Choudhri, I appreciate your time. You are done. 15 Have a great --</p> <p>16 THE WITNESS: Thank you so much. This 17 is hard for me.</p> <p>18 MR. BALLASES: I -- I understand. 19 Have a great Thanksgiving.</p> <p>20 THE WITNESS: Okay. You too.</p> <p>21 MR. BALLASES: Rest easy.</p> <p>22 THE WITNESS: Okay.</p> <p>23 MR. BALLASES: Feel better.</p> <p>24 THE VIDEOGRAPHER: Off the record at 25 3:34.</p>

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1	(Back on the record without video.)	1	WITNESS CORRECTIONS AND SIGNATURE		
2	THE REPORTER: Back on the record at	2	Please indicate changes on this sheet of paper, giving		
3	3:35 p.m.	3	the change, page number, line number and reason for the		
4	MS. HOOD: Counsel, we had an	4	change. Please sign each page of changes.		
5	agreement, I believe, the first day of her deposition	5	PAGE/LINE	CORRECTION	REASON FOR CHANGE
6	that she'd be allowed to read and sign it.	6	_____	_____	_____
7	MR. BALLASES: I mean, I don't recall	7	_____	_____	_____
8	having her read or not, but I'm fine with her reading	8	_____	_____	_____
9	and signing.	9	_____	_____	_____
10	MS. HOOD: Okay.	10	_____	_____	_____
11	THE REPORTER: If it wasn't said, I'm	11	_____	_____	_____
12	going to say this for me, because if it wasn't said, I	12	_____	_____	_____
13	didn't do it. But I know it was sent to the people	13	_____	_____	_____
14	that ordered it.	14	_____	_____	_____
15	MR. BALLASES: Yeah.	15	_____	_____	_____
16	MS. HOOD: She's going to be able to	16	_____	_____	_____
17	read and sign.	17	_____	_____	_____
18	MR. CHAUDHRI: So the record is clear,	18	_____	_____	_____
19	the deposition from last time and today's a	19	_____	_____	_____
20	continuation and this is read and sign, so the deponent	20	_____	_____	_____
21	will be provided a copy of the deposition so she can	21	_____	_____	_____
22	read it and sign it pursuant to the Rules and that's	22	_____	_____	_____
23	what I believe the parties have agreed to.	23	_____	_____	_____
24	MS. HOOD: Okay.	24	_____	_____	_____
25	MR. BALLASES: Yeah, this one is going	25	Shahnaz Choudhri		
Page 191		Page 193			
1	to be sent to her. I mean, the other one has already	1	I, Shahnaz Choudhri, have read the foregoing		
2	been sent out to everybody, but this one is going to go	2	deposition and hereby affix my signature that same is		
3	to her.	3	true and correct, except as noted above.		
4	MS. HOOD: I didn't --	4	_____		
5	MR. CHAUDHRI: It wasn't sent to her.	5	Shahnaz Choudhri		
6	So it will get sent to her. The continuation of the	6	STATE OF TEXAS _____)		
7	deposition from last time is as we agreed --	7	COUNTY OF _____)		
8	THE REPORTER: Whoever ordered on the	8	Before me, _____, on this day		
9	record was Ms. MacGeorge --	9	personally appeared Shahnaz Choudhri, known to me (or		
10	MS. HOOD: Okay. She's my witness so	10	proved to me under oath through _____) to be the		
11	you have to send it to me to read and sign.	11	person whose name is subscribed to the foregoing		
12	THE REPORTER: Not if it's not said.	12	instrument and acknowledged to me that they executed		
13	MS. HOOD: Okay. Well, I don't want	13	the same for the purposes and consideration therein		
14	to play games with you, we always say it. We said it	14	expressed.		
15	now.	15	GIVEN UNDER MY HAND AND SEAL OF OFFICE, on this,		
16	MR. CHAUDHRI: We said it today. We	16	_____ day of _____, 2024.		
17	said it now. So we're clear, this is a continuation	17	_____		
18	and we'll have one complete depo and we'll read and	18	Notary Public, State of Texas		
19	sign.	19	My Commission Expires: _____		
20	MS. HOOD: Okay. Now we're off the	20	_____		
21	record.	21	_____		
22	MR. CHAUDHRI: Thank you. Now we're	22	_____		
23	off the record.	23	_____		
24	(Proceedings concluded.)	24	_____		
25		25	_____		

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1 IN THE UNITED STATES BANKRUPTCY COURT
2 FOR THE SOUTHERN DISTRICT OF TEXAS
3 HOUSTON DIVISION

4 IN RE:)
5 HOUSTON REAL ESTATE PROPERTIES) CASE NO: 22-32998
6 LLC,) CHAPTER 7
7 Debtor.)
8 _____

9 JOHN QUINLAN)
10 and)
11 OMAR KHAWAJA)
12 and)
13 OSAMA ABDULLATIF,)
14 Plaintiffs,)
15 vs.) ADVERSARY NO. 23-3141
16)

17 JETALL COMPANIES, INC.)
18 and)
19 ARABELLA PH 3201 LLC)
20 and)
21 9201 MEMORIAL DR. LLC)
22 and)
23 2727 KIRBY 26L LLC)
24 and)
25 DALIO HOLDINGS I, LLC)
and)
DALIO HOLDINGS II, LLC)
and)
HOUSTON REAL ESTATE PROPERTIES)
LLC)
and)
SHAHNAZ CHOUDHRI)
and)
ALI CHOUDHRI)
and)
SHEPHERD-HULDY DEVELOPMENT I,)
LLC)
and)
SHEPHERD-HULDY DEVELOPMENT II,)
LLC)
and)
GALLERIA LOOP NOTE HOLDER LLC)
and)
)

1 party before the completion of the deposition.
2 I further certify that I am neither attorney nor
3 counsel for, related to, nor employed by any of the
4 parties to the action in which this testimony was
5 taken.
6 Further, I am not a relative or employee of any
7 attorney of record in this cause, nor do I have a
8 financial interest in the action.
9 Subscribed and sworn to on this 16th day of
10 December, 2024.
11

12

13 NILDA CODINA
14 Notary in and
15 for the State of Texas
16 My Commission No. 12878135-3
17 Expires: 10/24/2027

18

19 U.S. Legal Support, Inc.
20 Firm Registration No. 122
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22 Suite 800
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25

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